

February 19, 2026

VIA e-mail

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
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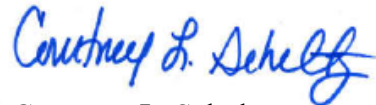
**RE: Petition of FirstEnergy Pennsylvania Electric Company for Approval of a
Phase V Energy Efficiency and Conservation - Docket No. M-2025-3057327**

Dear Secretary Homsher:

Enclosed for filing please find the Joint Petition for Complete Settlement with supporting appendices. Copies have been served on the parties as indicated on the Certificate of Service.

Should you have any questions, please contact me.

Respectfully,



Courtney L. Schultz

CLS/jlc
Encls.

cc. All Parties per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
M-2025-3057327**

CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of February, 2026 served a true copy of the Joint Petition for Settlement was served upon the persons listed below *via* e-mail:

Via E-File Only

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/s/ Courtney L. Schultz

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF FIRSTENERGY	:	Docket No. M-2025-3057327
PENNSYLVANIA ELECTRIC COMPANY	:	
FOR APPROVAL OF A PHASE V	:	
ENERGY EFFICIENCY AND	:	
CONSERVATION	:	

JOINT PETITION FOR COMPLETE SETTLEMENT

TO ADMINISTRATIVE LAW JUDGE ALPHONSO ARNOLD III:

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Met-Ed Industrial Users Group (“MEIUG”), the Penelec Industrial Customer Alliance (“PICA”), the West Penn Power Industrial Intervenors (“WPPII”), and the Keystone Energy Efficiency Alliance (“KEEA”) all parties in the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners”),¹ hereby file this Joint Petition for Complete Settlement (“Joint Petition”) and respectfully request that Administrative Law Judge (“ALJ”) Alphonso Arnold III and the Pennsylvania Public Utility Commission (“Commission”) approve this Joint Petition without modification.

As set forth and explained below, the Joint Petitioners have agreed to a settlement of all issues in the above-captioned proceeding. The Joint Petition provides for the approval of the Company’s Act 129 Phase V Energy Efficiency & Conservation Plan (the “Phase V Plan” or “Plan”) as modified by the terms and conditions of the Joint Petition and as set forth in **Appendix A** hereto.

¹ The Pennsylvania State University (“PSU”), an intervenor in this matter, does not oppose the Joint Petition.

I. BACKGROUND

1. On November 26, 2025, the Company filed a Petition with the Commission for Approval of its Phase V Plan. This filing was made pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa.C.S. §§ 2806.1 and 2806.2, and the Commission’s Implementation Order entered on June 18, 2025.²

2. In its Petition, the Company requested Commission approval of its Phase V Plan. The Phase V Plan included a suite of programs that are designed to meet the additional consumption reduction targets and coincident peak demand reduction targets adopted by the Commission’s Phase V Implementation Order during the five-year period from June 1, 2026, through May 31, 2031 (“Phase V Period”). Included with the Petition was the Company’s written direct testimony and supporting exhibits.

3. On December 2, 2025, CAUSE-PA filed a Petition to Intervene and Answer.

4. On December 4, 2025, OSBA filed a Notice of Appearance. On December 16, 2025, OSBA filed a Notice of Intervention and Public Statement.

5. On December 5, 2025, OCA filed a Notice of Appearance. On December 15, 2025, OCA filed a Notice of Intervention and Public Statement.

6. On December 18, 2025, MEIUG, PICA, and WPPII filed a Joint Petition to Intervene.

7. On December 23, 2025, PSU filed a Petition to Intervene.

8. On December 30, 2025, a Prehearing Conference Order and Hearing Notice were issued, which scheduled a prehearing conference for 10:00 AM on January 6, 2026.

² *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2025-3052826 (Implementation Order entered June 18, 2025) (“Phase V Implementation Order”).

9. On January 5, 2026, KEEA filed a Petition to Intervene and Answer, as well as a Notice of Appearance.

10. On January 6, 2026, a Prehearing Conference was held as scheduled. ALJ Arnold granted the petitions to intervene of CAUSE-PA, MEIUG, PICA, and WPPII.

11. On January 7, 2026, following the prehearing conference, a Prehearing Order was issued establishing a litigation schedule and adopting discovery modifications.

12. On January 9, 2026, a Revised Prehearing Order was issued and Notice of Hearing for an initial evidentiary hearing to take place on January 29, 2026 was issued. Additionally, KEEA's Petition to Intervene was granted via an Interim Order.

13. On January 16, 2026, OCA, OSBA, CAUSE-PA, and KEEA served their Direct Testimony.

14. On January 22, 2026, Comments on the Company's Phase V Plan were filed by RMI, Coalition for Equitable Energy and Housing in Pennsylvania, Energy Advocates, and the Clean Air Council.

15. On January 26, 2026, Uplight filed Comments on the Company's Phase V Plan.

16. On January 27, 2026, the Company served its written Rebuttal Testimony.

17. On January 29, 2026, the Company informed the ALJ that the parties reached a complete settlement in principle. ALJ Arnold held the evidentiary hearing as scheduled, whereupon the parties moved their pre-served exhibits and written testimony including exhibits and appendices into the record.

18. The parties also engaged in multiple rounds of discovery during the course of the proceeding.

19. The Joint Petitioners are in full agreement that settlement is in the public interest and should be approved by the Commission.

20. The settlement terms agreed to by the Joint Petitioners are as follows:

II. SETTLEMENT

A. GENERAL

21. The following terms of this Joint Petition reflect a carefully balanced compromise of the interests of all the active parties in this proceeding. The Joint Petitioners unanimously agree that this settlement is in the public interest.

22. The Joint Petitioners agree that the Company's Phase V Plan, as Revised in **Appendix A** to the Joint Petition, should be approved, subject to the terms and conditions of this Joint Petition as specified below.

B. RESIDENTIAL AND RESIDENTIAL LOW-INCOME PROGRAM

23. The Company agrees to target an increase equal to 650 megawatt-hour ("MWh") savings from the Residential Comprehensive Audits and the Residential Multifamily program components in the aggregate over the proposed plan targets, and to target an equivalent decrease in the MWh savings from its Residential Behavioral program component. The Company commits to tracking and reporting customer participation in the Company's proposed Residential Comprehensive Audits and Residential Multifamily program components consistent with the reporting templates established for Phase V.

24. The Company agrees to target decreases from its Low-Income Behavioral program component and its Low-Income Products program component, specifically its LED Linear, Smart Strip Plug Outlets and Air Purifier/Cleaner measures, by 2,500 MWh in the aggregate over the proposed plan targets. The Company will target an equivalent 2,500 MWh increase from heat

pumps, heat pump water heaters, and building insulation and air sealing measures provided through the Low-Income Weatherization component and/or Low-Income Multifamily program components, in the aggregate. The Company commits to tracking and reporting customer participation in the Company's proposed Low-Income Weatherization and Low-Income Multifamily program components consistent with the reporting templates established for Phase V.

25. The Company agrees to pursue Health and Safety remediation with other available programs. If other programs are not timely available or applicable, the Company will provide a portion of its Low-Income Weatherization program component budget for Health and Safety remediation, up to 50% of the total weatherization measure cost, when the cost and energy savings attributable to the remediation meet program component acquisition cost based on available program funds. The Company will develop a description of protocols and processes for addressing health and safety issues, including clear criteria for making referrals to Low Income Usage Reduction Program ("LIURP") or outside agencies versus addressing the health and safety issues within the Act 129 programs, and a process flow chart that illustrates the customer journey from audit through health and safety remediation through installation of energy efficiency measures. The Company will also devise and implement a process for tracking and following up on health and safety referrals to reduce the number of deferrals. The Company will share the protocols and processes developed under this paragraph with the parties within 150 days of approval of the Plan.

26. The Company agrees to target spending of at least \$600,000 per year of its Act 129 Low-Income Energy Efficiency Program budget on Health and Safety remediation to remove impediments for the installation of air sealing, insulation, and heat pumps for low-income households, subject to available program funding.

27. The Company agrees to continue implementing and operating its low-income programs throughout the full duration of Phase V even if it meets its low-income carveout before the end of the phase. The Company will monitor program expenditures and forecast expected participation. If it identifies that the low-income programs may fully expend their allocated budgets prior to the end of Phase V, the Company will consider reallocation of funds from other programs, subject to the Company's sole discretion as to its ability to satisfy its other savings targets, requirements and the Plan's overall cost effectiveness. The Company will notify the parties if it projects that funds will be depleted prior to the end of Phase V and will inform parties of any plans to reallocate funds from other programs.

28. The Company agrees to assess cross-participation by Home Energy Report recipients in other residential energy efficiency programs through evaluation of the program and will leverage this information to encourage participation in other residential programs.

C. SMALL COMMERCIAL AND INDUSTRIAL LIGHTING

29. The Company agrees to decrease MWh savings from interior and exterior Small Commercial and Industrial lighting by 10% and commensurately increase MWh savings from other Small Commercial and Industrial custom, custom building improvements, air sealing, insulation offerings and/or HVAC/heat pump offerings.

D. TARIFF STREETLIGHTING

30. The Company agrees to remove participation and incentives for tariff streetlighting measures and to reallocate the incentive budgets to target equivalent increases in MWh and megawatt ("MW") savings from the Custom and/or the Energy Management program components in the aggregate, over the proposed plan targets, based on available program funds. The Company

will maintain a one-year reconciliation rate for Phase IV costs for the Streetlighting class. After that, any remaining balance will be transferred to the Commercial class.

E. DAILY LOAD SHIFTING AND PEAK DEMAND REDUCTION

31. The Company will revise its Daily Load Shifting (“DLS”) and Peak Demand Reduction (“PDR”) program components projections for smart thermostats to 6 MW to reflect a ramp up in participation and savings that also allows sufficient time for a Conservation Service Provider (“CSP”) to be onboarded.

32. The Company agrees to revise its eligibility criteria for the DLS and PDR program components to exclude diesel and other fossil fuel backup generators, so long as such exclusion does not impede the Company’s ability to meet its DLS and PDR targets. In all cases, customers who receive incentives from the Company’s DLS and PDR program components will comply with local air quality standards. On an annual basis, the Company will report the number of participating customers in the DLS and PDR program components (if any) that used diesel and other fossil fuel backup generators.

33. The Company agrees to clarify the incentive structure for the DLS and PDR program components in Appendix B Table 8: Eligible Measures, by technology, and that the incentive structure will be based on industry experience. The Company agrees to work with its evaluation, measurement and verification CSP, implementation CSP and the Statewide Evaluator to develop interim measure protocols for DLS and PDR and to conduct seasonal reviews of relevant data in the Company’s tracking system (*e.g.*, participation, opt-out rates, summer and winter peak load reductions). The Company further agrees to review the performance of its DLS and PDR program performance in stakeholder meetings.

F. MULTIFAMILY PROGRAMMING

34. Within 150 days of Plan approval, the Company will develop and disseminate clear information and program marketing materials to multifamily property managers regarding the measures, incentives, and cost sharing requirements that will be available to them to improve the energy efficiency of their properties. The Company will share this information and program marketing materials with the parties at stakeholder meetings.

35. Tenant Participation. Within 150 days of Plan approval, the Company will review its landlord consent protocols with its Phase V implementation CSP and convene a meeting with interested parties and other interested stakeholders to discuss any additional measures or delivery mechanisms that would allow tenants to benefit from Act 129 programming where landlord approval is not required.

36. Low-Income Multifamily Incentive Structure. The Company agrees to clarify the incentive structure for the Multifamily Program components by measure type in Appendix B Table 8: Eligible Measures. Specifically, for master metered and individually metered multifamily buildings, the Company will provide an enhanced incentive of up to 80% in common areas and 100% in low-income tenant spaces. Individually metered tenant units in multifamily buildings will be eligible for the same incentives available through the residential or low-income programs, depending on whether the building meets the low-income occupant threshold.

37. ASHRAE Level 2 Audits. The Company will cover up to 80% of the cost of an ASHRAE Level 2 Audit with the Pennsylvania Department of Environmental Protection (“DEP”) for multifamily buildings that participate in DEP’s Home Energy Rebate Program if the project is likely to result in significant electric savings that could be claimed through the Commission’s 100% attribution rule in its Implementation Order.

38. Low-Income Multifamily Eligibility Threshold. If at least 50% of the occupants of a multifamily building have household income at or below 150% of the Federal Poverty Line, the entire building will qualify for enhanced incentives.

39. The Company will work with interested parties to develop a list of low-income housing programs that will be considered categorically eligible for enhanced incentives through the Low-Income Multifamily Program. This list will include housing types that are supported through local, state, or federal funds and have independent eligibility guidelines that are consistent with the eligibility guidelines identified in Paragraph 38. Within 150 days of Plan approval, the Company will file a compliance letter with the Commission identifying the housing programs that will qualify for categorical eligibility.

G. FRONT OF THE METER

40. The Company agrees to assign Front of the Meter (“FTM”) savings and costs to the appropriate customer classes based on energy savings, except that no FTM savings will be assigned or allocated to the low-income customer savings carve-out requirement, and no costs will be assigned to the low-income customer programs.

41. The Company agrees to review FTM measures that it identifies to include in its Plan, including costs, projected energy and demand savings by sector and EM&V protocols, with interested parties ninety (90) days prior to their implementation during Phase V, and will consider and respond to any comments provided by the parties.

42. The parties’ agreement in this settlement is not an indication that they agree to the prudence or cost effectiveness of the FTM proposal, as further clarified pursuant to Paragraph 40, and reserve the right to challenge the FTM program in an appropriate filing or subsequent phases.

H. TRACKING AND REPORTING

43. The Company agrees to track and report unique customer participation in its Small and Large Commercial and Industrial program components in its Annual Reports consistent with the Commission's reporting templates established for Phase V.

44. The Company commits to tracking and reporting customer participation in the Company's Plan consistent with the reporting templates established for Phase V.

45. The Company agrees to identify and describe participation pathways for industry-specific customer segments, including, at a minimum, agriculture and data center customers, where such pathways are cost-effective and consistent with Act 129 requirements and the Company's Plan, within 150-days of approval of the Company's Phase V Plan.

46. The Company agrees to track and report participation and expenditures for multi-family buildings and other businesses in its Annual Reports consistent with the Commission's reporting templates established for Phase V.

47. The Company agrees to track and report customer participation and demand savings of its DLS and PDR program components in its Annual Reports consistent with the Commission's reporting templates established for Phase V.

48. The Company will track and report Health and Safety remediation in its annual reports consistent with the Commission's reporting templates established for Phase V.

I. PROGRAM COORDINATION

49. On at least an annual basis through the duration of Phase V, the Company will convene program coordination meetings with other partners, including Natural Gas Distribution Companies with overlapping service territory, LIURP providers, Weatherization Assistance Program providers, home preservation program providers, DEP, and other stakeholders, including,

but not limited to, interested parties to this proceeding, to identify steps to improve program coordination. At a minimum, the meetings will address implementation of recommendations from the Commission's data sharing work group, streamlined referral processes and coordinated measure delivery. The Company will provide updates regarding its coordination with other partners at the Company's Act 129 stakeholder meetings.

J. STAKEHOLDER MEETINGS

50. The Company will hold biannual stakeholder meetings for the duration of the Plan. At least one stakeholder meeting per year will be held in person at a central location and will include a remote option.

51. Notice of stakeholder meetings will be sent to all stakeholders, including, but not limited to, the parties to this proceeding, at least 45 days in advance of the meeting, and an agenda and meeting materials will be circulated at least one week prior to the meeting.

III. THE SETTLEMENT IS IN THE PUBLIC INTEREST

52. Commission policy promotes settlements. *See* 52 Pa. Code § 5.231. Settlements reduce the time and expense that parties must expend litigating a case and, at the same time, conserve administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *See id.* § 69.401. To accept a settlement, the Commission must first determine that the proposed terms and conditions are in the public interest. *Pa. PUC v. York Water Co.*, Docket No. R-00049165 (Order Entered Oct. 4, 2004); *Pa. PUC v. C.S. Water and Sewer Assocs.*, 74 Pa. P.U.C. 767 (1991).

53. This settlement was achieved by the parties after an extensive investigation of the Company's Phase V Plan, including extensive informal and formal discovery and the exchange of written Direct and Rebuttal Testimony.

54. Approval of the Joint Petition avoids the necessity and costs of further administrative and potential appellate proceedings.

55. The Joint Petitioners will further supplement the reasons that the Joint Petition is in the public interest in their Statements in Support, which are attached hereto as **Appendix B through Appendix G**. In their respective Statements in Support, each Joint Petitioner explains why, in its view, the settlement is fair, just, and reasonable and reflects a reasonable compromise of the disputed issues in this proceeding.

IV. CONDITIONS OF SETTLEMENT

56. Each term and condition set forth in this Joint Petition, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is a material consideration to the entry into this settlement by the Joint Petitioners.

57. This settlement is conditioned upon the Commission's approval of the Joint Petition's terms and conditions contained herein without modification. If the Commission modifies the settlement, then any Joint Petitioner may elect to withdraw from this settlement and may proceed with litigation and, in such event, this Joint Petition shall be void and of no effect. Such election to withdraw must be made in writing, filed with the Secretary of the Commission and served upon all Joint Petitioners within five (5) business days after the entry of an order modifying the Joint Petition. The Joint Petitioners acknowledge and agree that this Joint Petition, if approved, shall have the same force and effect as if the Joint Petitioners had fully litigated this proceeding.

58. This Joint Petition is proposed by the Joint Petitioners to settle all issues in the instant proceeding. If the Commission does not approve the Joint Petition and the proceedings continue to further hearings, the Joint Petitioners reserve their respective rights to present

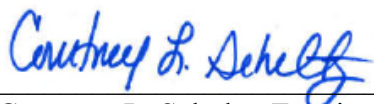
additional testimony and to conduct full cross-examination, briefing, and argument. The Joint Petition is entered into without any admission against, or prejudice to, any position which any Joint Petitioner may adopt in the event of any subsequent litigation of this proceeding.

59. This Joint Petition may not be cited as precedent in any future proceeding, except to the extent required to implement this Joint Petition.

60. This Joint Petition is being presented only in the context of this proceeding in an effort to resolve the proceeding in a manner which is fair and reasonable. Joint Petition is the product of compromise. This Joint Petition is presented without prejudice to any position which any of the Joint Petitioners may have advanced and without prejudice to the position any of the Joint Petitioners may advance in the future on the merits of the issues in future proceedings except to the extent necessary to effectuate the terms and conditions of this Joint Petition. This Joint Petition does not preclude the Joint Petitioners from taking other positions in proceedings of other public utilities.

61. If the presiding administrative law judge adopt the Joint Petition without modification, the Joint Petitioners agree that they: (i) will not initiate or join in any challenge to the Joint Petition and (ii) waive their right to appeal or to seek reconsideration, rehearing, reargument, or clarification of the Commission's order approving the Joint Petition. The Joint Petitioners further agree that unless otherwise expressly indicated, all terms and conditions contained herein shall take effect upon issuance of a final order in this proceeding, without the need or requirement for additional Commission review or approval.

Respectfully submitted,



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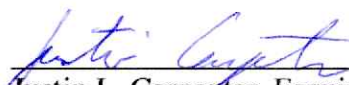
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Dated: February 19, 2026

APPENDIX A



FirstEnergy Pennsylvania Electric Company

Docket No. M-2025-3057327

Phase V Energy Efficiency & Conservation Plan

(For the Period June 1, 2026 through May 31, 2031)

Revised February 19, 2026

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1.5 Summary description of the EDC implementation strategy to acquire at least 15% of its portfolio consumption reduction and peak demand reduction target in each program year.	27
1.6 Summary description of the EDC implementation strategy to acquire at least 75% of the portfolio MW compliance target in each season. (2025 IO at 142) If an alternative summer or winter performance window is proposed for daily load shifting programs, provide a rationale for the alternative window. If the proposal calls for differentiated windows based on local distribution system needs, summarize the proposed taxonomy and prepare a supplemental table that maps distribution assets or transmission zones to peak demand performance windows. (2025 IO at 154) ..	27
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ACC	Avoided Cost Calculator
AEPS	Alternative Energy Portfolio Standard
AHU	Air Handling Unit
ASHRAE	American Society of Heating, Refrigerating, and Air Conditioning Engineers
BOC	Building Operations Certification
BPI	Building Professional Institute
BTM	Behind the Meter
C&I	Commercial and Industrial
CBO	Community Based Organizations
CEE	Consortium for Energy Efficiency
CIAC	Contribution in Aid of Construction
CSP	Conservation Service Provider
DCED	Department of Community and Economic Development
DR	Demand Response
DEP	Pennsylvania Department of Environmental Protection
DLS	Daily Load Shifting
EDC	Electric Distribution Company
EE	Energy Efficiency
EE&C	Energy Efficiency and Conservation
EM&V	Evaluation, Measurement, and Verification
EPA	Environmental Protection Agency
EPRI	Electric Power Research Institute
FPIG	Federal Poverty Income Guideline
FTM	Front of the Meter
FTP	File Transfer Protocol
GNI	Government, Non-Profit, Institutional
GRT	Gross Receipts Tax
HBA	Home Builder Associations
HER	Home Energy Report
HERS	Home Energy Rating System
HVAC	Heating, Ventilating, and Air Conditioning
IT	Information Technology
KW	Kilowatt
KWH	Kilowatt-hour
LCI	Large Commercial & Industrial
LED	Light-Emitting Diode
LI	Low-Income
LIURP	Low-Income Usage Reduction Program
M&V	Measurement and Verification

MPS	Market Potential Study
MW	Megawatt
MWH	Megawatt-hour
NGDC	Natural Gas Distribution Company
NPV	Net Present Value
NTG	Net-to-Gross
PA PUC	Pennsylvania Public Utility Commission
PHFA	Pennsylvania Housing Financing Agency
POS	Point of Sale
PDR	Peak Demand Reduction
PJM	PJM Interconnection LLC
PLC	Peak Load Contribution
PUC	Public Utility Commission
QA/QC	Quality Assurance/Quality Control
RAD	Responsible Appliance Disposal
RCX	Retro-Commissioning
RESNET	Residential Energy Services Network
RFP	Request for Proposal
RTU	Roof Top Unit
SAP	System Applications and Products, is FirstEnergy's Enterprise Resource Planning (ERP) software
SCI	Small Commercial & Industrial
SWE	Statewide Evaluator
T&R	Tracking and Reporting
TRC	Total Resource Cost
TRM	Technical Reference Manual
VCX	Virtual Commissioning
XML	Extensible Markup Language

Mapping of Program Years to Dates

Program Year	Start Date	End Date
PY18	June 1, 2026	May 31, 2027
PY19	June 1, 2027	May 31, 2028
PY20	June 1, 2028	May 31, 2029
PY21	June 1, 2029	May 31, 2030
PY22	June 1, 2030	May 31, 2031

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1. OVERVIEW OF PLAN

Introduction

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”), through its Energy Efficiency plan development team (“EE&C Team”), has developed this Energy Efficiency and Conservation Plan (“Phase V Plan” or “EE&C Plan” or “Plan”) for the period June 1, 2026 through May 31, 2031 (“Phase V Period”) in accordance with Act 129 of 2008¹ (“Act 129”) and the Commission’s Phase V Implementation Order, issued on June 18, 2025 at Docket No. M-2025-3052826 (“Phase V Implementation Order”). As detailed below, the Company’s Phase V Plan is based on both the 2026 Total Resource Cost (“TRC”) Test Final Order (“PA TRC Order”)² and the 2026 Technical Reference Manual (“PA TRM”) and is designed to meet all requirements as set forth in the Phase V Implementation Order.

Historic Background

On October 15, 2008, then Governor Rendell signed Act 129 into law. Act 129 imposed new requirements on Pennsylvania’s Electric Distribution Companies (“EDCs”) in the areas of energy efficiency and conservation, smart meters, procurement and alternative energy sources. Among other things, Act 129 required every EDC with at least 100,000 customers to adopt and implement a plan, approved by the Commission, to reduce energy demand and consumption within its service territory during the period June 1, 2010 through May 31, 2013³ (“Phase I”).

Act 129 also authorized the Commission to evaluate whether it was cost beneficial to continue the EE&C program beyond Phase I.⁴ The Commission concluded in its August 3, 2012 Order at Docket Nos. M-2012-2289411 and M-2008-2069887⁵ (“Phase II Implementation Order”) that further energy efficiency programs would be cost effective and established Phase II of the EE&C program, requiring EDCs to adopt and implement cost effective plans to reduce energy consumption throughout the Commonwealth for the period June 1, 2013 through May 31, 2016 (“Phase II Period”). FirstEnergy Corp.’s four Pennsylvania operating companies, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively “Predecessor Companies”), submitted plans to comply with the 2012 Implementation Order, which were approved by the Commission (“Phase II Plans”).⁶

¹ 66 Pa.C.S. §2806.1 *et seq.*

² 2026 Total Resource Cost Test Final Order, Docket No. M-2024-3048998 (Order entered November 7, 2024).

³ 66 Pa.C.S. § 2806.1.

⁴ 66 Pa.C.S. § 2806.1(c) (3).

⁵ See *Energy Efficiency and Conservation Program Implementation Order*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order Entered August 3, 2012).

⁶ See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Consolidation of Proceedings and Approval of its Act 129 Phase II Energy Efficiency and Conservation Plans*, Docket Nos. M-2012-2334387, M-2012-2334392, M-2012-2334395 and M-2012-2334398 (Opinion and Order entered March 14, 2013)).

In accordance with Act 129, the Commission determined in its June 19, 2015 Order at Docket Nos. M-2014-2424864⁷ (“Phase III Implementation Order”) that further energy efficiency and demand reduction programs would be cost effective and established Phase III of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth for the period June 1, 2016 through May 31, 2021 (“Phase III Period”). The Predecessor Companies submitted plans to comply with the Phase III Implementation Order, which were approved by the Commission (“Phase III Plans”).⁸

Also in accordance with Act 129, the Commission determined in its June 18, 2020 Order at Docket No. M-2020-3015228⁹ (“Phase IV Implementation Order”) that additional energy efficiency programs would be cost effective and established Phase IV of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth for the period June 1, 2021 through May 31, 2026 (“Phase IV Period”). The Predecessor Companies submitted plans to comply with the Phase IV Implementation Order, which were approved by the Commission and are currently being implemented (“Phase IV Plans”).¹⁰

The Commission concluded in the Phase V Implementation Order¹¹ that additional energy efficiency and demand reduction programs would be cost effective and established Phase V of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth. The Commission further acknowledged the consolidation of the Predecessor Companies (Met-Ed, Penelec, Penn Power and West Penn into Rate Districts of a single EDC, FE PA, and aggregated them to reflect a single EDC.¹² Pursuant to the Phase V Implementation Order, the Company submits this Phase V Plan.¹³

⁷ See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2014-2424864 (Order entered June 19, 2015).

⁸ See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Consolidation of Proceedings and Approval of Act 129 Phase III Energy Efficiency and Conservation Plans*, Docket Nos. M-2015-2514767, M-2015-2514768, M-2015-2514769, and M-2015-2514772 (Order entered March 10, 2016).

⁹ See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2020-3015228 (Order entered June 18, 2020).

¹⁰ See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Consolidation of Proceedings and Approval of Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket Nos. M-2020-3020820, M-2020-3020821, M-2020-3020822, and M-2020-3020823 (Opinion and Order entered March 25, 2021).

¹¹ See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2025-3052826 (Order entered June 18, 2025).

¹² Phase V Implementation Order at 13-14.

¹³ On January 1, 2024, FirstEnergy Corp.’s Pennsylvania operating companies (i.e., Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) merged into

1.1 Summary description of plan, plan objectives, and overall strategy to achieve energy efficiency and conservation goals.

Objectives:

In developing the Phase V Plan, the EE&C Team set forth to develop a plan that meets all requirements as established in Act 129 and the Phase V Implementation Order, including:

- Achieving the consumption reduction and peak demand reduction targets within the allowable budget;
- Achieving the consumption reduction target from the low-income sector from programs solely directed at low-income customers or low-income verified participants in multifamily housing programs;
- Meeting the budget requirement that at least 50% of EE&C Plan budgets are for incentives;
- Including at least one comprehensive program for residential and at least one comprehensive program for non-residential customer classes;
- Offering a well-reasoned and balanced set of measures that are tailored to usage and with the potential for savings and reductions for each customer class; and
- Coordinating with other conservation programs and leveraging these external programs and funding to complement the Act 129 programs and encourage further participation within the existing budget constraint.

Description of the Plan and Strategy for Success:

Keeping in mind these key objectives, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. To meet the requirement that savings counted towards the low-income savings carve-out come from specific low-income programs or low-income verified participants in multifamily housing programs, the Phase V Plan includes both a low-income program that specifically targets certain measures and services to this sector as well as multifamily housing offerings that will additionally serve low-income customers. The Phase V Plan includes a broad portfolio of programs and measures, including a comprehensive program for both the residential and the non-residential customer sectors. The Phase V Plan also incorporates both near-term and longer-term energy saving opportunities for all customers and includes multiple prescriptive and custom measures, direct install, and comprehensive whole home/whole building solutions. Collectively, the proposed programs across all sectors incorporate customer engagement and education and cover major energy-consuming devices in the home, building, or business, thus providing a broad portfolio of measures giving the opportunity for all customer classes to participate and benefit from one or more program offerings. Furthermore, the proposed programs promote and support comprehensive whole

FirstEnergy Pennsylvania Electric Company. Due to the merger transaction, the affected operating companies' tariffs were consolidated into a single tariff, with each former operating company's rates becoming its own rate district.

home/whole building/solutions across all customer classes, targeting deeper savings and comprehensive retrofits.

The Phase V Plan was developed based on experience gained through the completion of the Phase I through III Plans and the current implementation of the Phase IV Plans, factoring in: (i) performance to date of not only the Predecessor Companies' programs, but also the performance of similar programs of both affiliated and non-affiliated utilities; (ii) feedback and suggestions received from the Company's energy efficiency consultant, vendors, and contractors; and (iii) input from stakeholders. The Phase V Plan continues to rely on experienced outsourced Conservation Service Providers ("CSPs"), leverages prior experiences, and includes a mix of expanded and new measures or services that take advantage of leveraging opportunities, volume cost efficiencies, and a variety of delivery channels that will support successful and efficient program operations and customer participation.

The program designs presented in this Phase V Plan are organized into the following customer sectors: (1) Residential; (2) Residential Low-Income; (3) Small Commercial and Industrial ("SCI"); and (4) Large Commercial and Industrial ("LCI").

Residential Sector – Residential energy efficiency program offerings were designed to address both educational and initial cost barriers and to tap a variety of delivery channels and vendors to support customer engagement, education, and participation. The residential offerings include targeted program components that engage customers and serve as a portal for other program offerings because they serve a dual purpose by providing customers with energy efficiency education as well as information regarding other program services and opportunities upon which they can act. The residential offerings incorporate strategies to assist customers in changing their behaviors and include incentives to address the initial cost barrier to promote the participation of all residential customers. The residential offerings also include components that provide opportunities for prescriptive equipment and direct install so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase efficiency, as well as components that promote and provide opportunities for customers interested in whole home/comprehensive solutions that encourage customers to consider a holistic approach to energy efficiency.

Supplementing the savings achieved from EE&C measures, daily load-shifting ("DLS") and peak demand reduction ("PDR") program opportunities were designed to deliver peak reductions during daily peak hours for both the summer and winter periods using a variety of approaches and technologies that support broader customer engagement and participation. The residential DLS & PDR offerings include components that target both behavioral and connected devices (e.g., connected thermostats, battery storage, electric vehicles, etc.), with both daily load-shifting and peak demand reduction opportunities. The demand response program offering for connected devices also includes incentives to promote the enrollment and participation of customers.

Low-Income Sub-Sector – Within the residential sector there is a special sub-sector of low-income customers. The low-income program offerings outlined in this Phase V Plan will serve a dual purpose of contributing to Act 129 goal attainment and minimizing the percentage of household income that is devoted to energy costs. Basic, enhanced, and comprehensive services and education will be offered in the low-income sub-sector to help these households improve their energy efficiency and control energy spending.

Like its Residential Sector program counterparts, the low-income sub-sector program offerings are designed with a progression from general to specific to make EE&C program opportunities and services available to all low-income customers. The low-income offerings include a program component that will provide customized home energy reports and on-line audits that provide low-income customers with energy efficiency education, recommendations, and information regarding other services upon which they can act. Additional low-income program offerings include measures to conduct outreach, help identify new low-income customers, achieve additional energy savings opportunities, and promote energy efficiency in low-income homes. The Company also plans to achieve additional new and incremental electric energy savings through coordination with the Company's existing comprehensive Low-Income Usage Reduction Program ("LIURP"), known as the WARM program, by tapping the considerable expertise and existing infrastructure of LIURP contractors comprised of both Community Based Organizations ("CBOs") and private contractors. The LIURP program has offered comprehensive energy efficiency services to eligible Pennsylvania households for years. This aspect of the Phase V Plan enhances and accelerates the deployment of services to LIURP-eligible or treated households by providing additional measures and services to achieve deeper savings in addition to the LIURP services or by serving additional homes. The Company may supplement the delivery system as deemed necessary by adding additional subcontractors.

Small and Large, Commercial & Industrial Sector – The Commercial and Industrial energy efficiency program offerings were designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all customers. Commercial businesses and industrial customers are also addressed through program components that provide opportunities including prescriptive rebates, custom measures, building tune-up, and whole building/comprehensive solutions. Program offerings ensure access for small customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. And the program offerings also include structured energy efficiency and energy management opportunities that encourage customers to consider a holistic approach to Energy Efficiency for customers who are interested and able to participate in whole building/comprehensive solutions.

The Commercial & Industrial DLS and PDR program opportunities were designed to supplement the peak load reductions that result from EE&C measures with additional peak load reductions during daily peak hours for both the summer and winter periods utilizing a

variety of approaches and technologies to support broader customer engagement and participation. The offerings include components that target both connected devices and custom opportunities for both. The demand response program offerings also include incentives to promote the enrollment, participation and/or performance of customers.

Front of the Meter (“FTM”) measures are included in the Residential, SCI and LCI sectors of the Phase V Plan to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system and reduce demand during peak hours, and help to mitigate growing resource adequacy concerns in the State.

FE PA Table 1 below describes each of the programs that are included in the Phase V Plan. More detailed descriptions of the programs are provided in Section 3.

FE PA Table 1: Program Summary Descriptions

FE PA Table 1: Program Summary Descriptions	
Proposed Program	Program Description
Residential	
Residential Energy Solutions Program	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.
Residential Low Income	
Low Income Energy Efficiency Program	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.
Small Commercial & Industrial	
C&I Energy Solutions Program - Small	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.
Large Commercial & Industrial	
C&I Energy Solutions Program - Large	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.

FE PA Table 2 below provides the delivery channels that are currently anticipated for the programs included in the Phase V Plan. As each program is implemented, the Company

will consider and may revise the delivery channels to enhance the performance of a given program component.

FE PA Table 2: Program Delivery Channels

FE PA Table 2: Program Delivery Channels					
Program	Program Component	Rebate	Kits	Up/Mid-Stream	Direct Install
Residential Programs					
Residential Energy Solutions Program	Products	X			
	HVAC & Solar	X			
	Comprehensive Audits	X			
	Multi Family - Res				X
	Behavioral				
	New Homes	X			
	DLS & DR - Res	X			
	FTM-Res				
Residential Low Income Programs					
Low Income Energy Efficiency Program	Weatherization		X		X
	LI - Products	X			
	LI - HVAC	X			
	LI - Audits	X			
	LI - Behavioral				
	LI - New Homes	X			
	LI - Multifamily - Res				X
Small Commercial & Industrial Programs					
C&I Energy Solutions Program - Small	Multi Family - SCI				X
	Prescriptive - SCI	X		X	
	Custom - SCI	X			
	Energy Management - SCI	X			X
	DLS & DR - SCI	X			
	FTM-SCI				
Large Commercial & Industrial Programs					
C&I Energy Solutions Program - Large	Multi Family - LCI				X
	Prescriptive - LCI	X		X	
	Custom - LCI	X			X
	Energy Management - LCI	X			
	DLS & DR - LCI	X			
	FTM-LCI				

Like the Phase III and IV Plans, the Phase V Plan continues the use of incentive level ranges. Under this approach, the Company has the ability to adjust rebate levels within the range as market conditions warrant, provided that these adjustments do not increase program costs beyond the approved budget. Based on these ranges, the Company can timely adjust incentives for the measures or services. This will aid the Company either avoid overpaying for measures, or if it is determined that an incentive is not sufficient, increase incentives to enhance market response without missing potential opportunities. This allows the Company to quickly react to changing market conditions, thus optimizing its ability and efforts to cost-effectively achieve its goals.

Appendix B, Table 8 lists the planned incentive level ranges associated with each of the measures included in the Phase V Plan. For some measures, Company pre-approval may

be required, and there may be limits on the number of units that will be rebated to any one customer or through any one program to support program operations, budget management, and verification of existing equipment. More detail is provided in the individual program descriptions in Section 3.

The total proposed cost of the Phase V Plan is \$390,319,972 as reported in Appendix B, Table 7 and Table 13. These costs will be recovered through the Company's Phase V EE&C-C Rider, which is summarized in Section 7 and is subject to Commission approval. The successful implementation of the Company's Phase V Plan is projected to be cost-effective at the portfolio level under the PA TRC test, with a benefit-cost ratio of 1.1. Additional details are provided in Appendix B, Tables 1, 14, and 15.

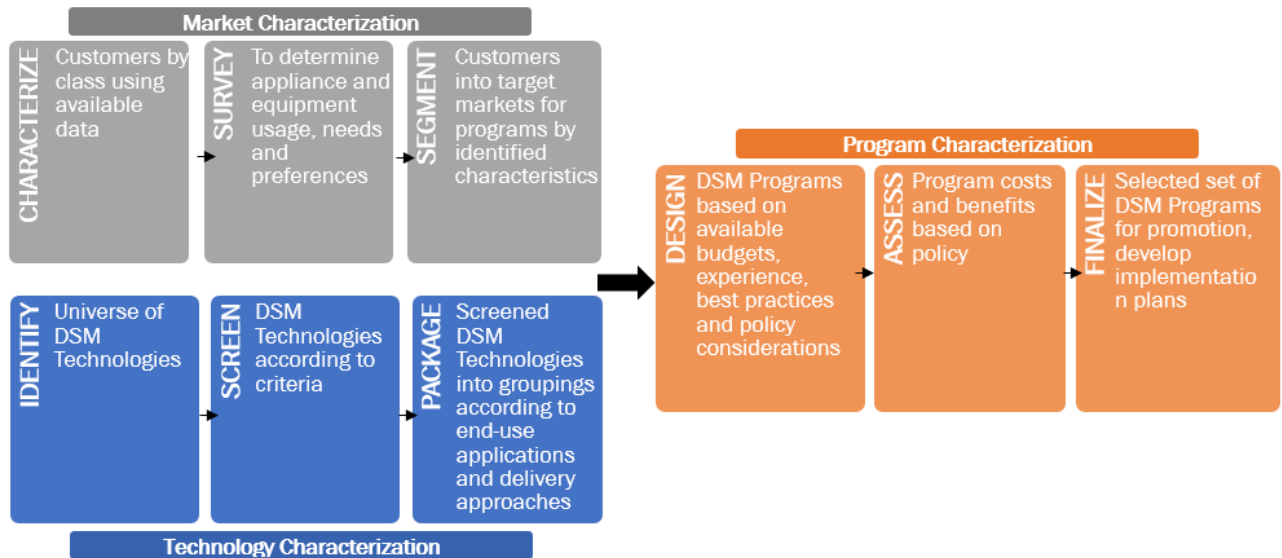
The Company believes it has developed a successful strategy to achieve its Phase V goals. This strategy includes offering a broad range of energy efficiency and demand response program opportunities through a variety of delivery channels, continued use of outsourced vendors with expertise in program implementation services, including managing program operations as well as marketing, customer enrollment, program and trade alley engagement, application and rebate processing, Evaluation, Measurement, and Verification ("EM&V") and implementation of the tracking and reporting system. This network of contractors reports to a core team within the FirstEnergy Energy Efficiency group, who will provide administration and oversight of this Phase V Plan. The Company will closely monitor programs for performance and, if needed, make any necessary adjustment to improve performance, including a shift of emphasis from lesser to higher performing programs and adjusting rebate levels based on market conditions and performance. This strategy was initially established during Phase I of Act 129 and has since continued and proven to be successful.

1.2 *Summary description of process used to develop the EE&C plan and key assumptions used in preparing the plan. Provide the basis for key assumptions and discuss sources of uncertainty that may affect the plan. This summary should include a description of the EDC's process for stakeholder engagement during both the development and implementation of the EE&C Plan.*

Process

FE PA Figure 1, below, illustrates the process undertaken by the EE&C Team to develop the Phase V Plan:

FE PA Figure 1: FirstEnergy EE&C Plan Development Process



When developing the Phase V Plan, the EE&C Team reviewed the programs and measures included in the Predecessor Companies' Phase IV Plans and other potential program offerings that it identified through review of other utilities and affiliates, industry review, input from stakeholders, the Company's energy efficiency consultant, and vendors, and a review of both the PA TRM and the Energy Efficiency and Peak Demand Reduction Market Potential Study ("EEMPS") and the Demand Response Potential Study ("DRPS"), collectively referred to as the "MPS"¹⁴. Potential program offerings were assessed based on: (i) experience gained through implementation of the Phase IV Plans and prior plans; (ii) performance of the programs and measures offered in the Predecessor Companies' Phase IV Plans; (iii) information related to the design and performance of programs and measures being offered by other FirstEnergy affiliates and other utilities both within and outside of Pennsylvania; and (iv) input from stakeholders, vendors as well as the Company's energy efficiency consultant (collectively, "Assessment Input"). Based on this Assessment Input, the EE&C Team developed participation level estimates and corresponding program and measure savings and costs.

The EE&C Team used an iterative process to refine and complete the modeling, which included the review of the projected results for each sector, program component and measure with the Company's energy efficiency consultant and implementation team. This review included assessing the reasonableness of the projected results based on potential in the market, potential customer participation and savings, and estimated costs. Estimated program participation values were informed by program implementation experience through the Phase IV Plans, the implementation of affiliate programs in other jurisdictions,

¹⁴ See *Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report* dated February 7, 2024, Available at <https://www.puc.pa.gov/pcdocs/1867286.pdf>. Also see EEPDR Phase V Demand Response Potential Study dated February 2025, available at : <https://www.puc.pa.gov/pcdocs/1867287.pdf>. Both documents released on February 24, 2025 via Secretarial Letter at Docket No. M-2025-3052827.

the experience of the Company's energy efficiency consultant and vendors, and the MPS. Potential program measure savings were predominantly based upon the values and formulae included in the PA TRM, actual program and evaluation results to date, individual customer project results, and other states' TRMs that were established to support energy efficiency programs in those jurisdictions.

The Company's approach to developing the Phase V Plan balanced and considered several key sources of information, including:

- Pennsylvania-specific information including the performance of the Company's current programs, the MPS, the Statewide Evaluator ("SWE") Database and the PA TRM;
- CSPs' expertise in delivering programs and program performance;
- Industry experience from market potential studies, the Company's energy efficiency consultant, evaluation results, and TRMs from other states;
- External stakeholder and vendor experience and input captured in meetings and other discussions; and
- Customer attitudes and preferences based on program performance in Pennsylvania and other jurisdictions.

There are both portfolio-based and program component/measure-specific assumptions that must be made when modeling the programs included in this Phase V Plan. To support the modeling effort, the Company relied on the incentives and costs of various program elements based on both the Company's experience with like programs and input from the Company's EE&C consultant and vendors based on industry experience throughout the country as well as input from the EE&C Team. Customer participation levels and other program component/measure specific assumptions are set forth in Appendix B, Tables 8 and 9, and Appendix C, FE PA Table C-2. For purposes of cost effectiveness testing, the Company developed its avoided cost inputs based on the methodology prescribed by the Commission in the PA TRC Order, utilized the SWE's Avoided Cost Calculator ("ACC") tool and followed additional guidance provided by the SWE. Cost effectiveness testing is more fully described in Section 8.

The Phase V Plan is based on an assumption that the Commission will timely approve CSP contracts and the Phase V Plan itself in March 2026 to support CSP set-up, start-up, and other activities to ready programs for implementation beginning June 1, 2026. There are numerous other sources of uncertainty associated with the Phase V Plan assumptions. As with any plan that relies on forecasts, there are inherent risks associated with the assumptions used to develop participation rates, savings calculations, and cost of programs, among others. Several economic conditions (inflation rates, tariffs, product availability, etc.) may directly affect customers' ability and/or willingness to participate in programs and the cost of those programs. Further, the Company raised uncertainties with the MPS associated with the projected savings and costs assumed for customer participation, savings from several EE technologies (e.g. solar, CHP, C&I lighting), and lack of industry experience with daily load-shifting programs and winter demand response as expressed in

its comments to the Commission's Tentative Implementation Order.¹⁵ These raise uncertainties with customers' willingness to participate across a performance period covering over 400 hours per year and with customer and technology performance and load impacts over the performance period. More stringent standards and building codes during the Phase V Period would also affect customer participation in programs, savings results, and costs.

As the Phase V Plan was developed, the Company sought and obtained feedback on the proposed EE&C programs from stakeholders through a variety of methods. Stakeholder meetings discussing the Phase V Plan's development and program design were held on July 30th, 2025, and September 11th, 2025. The Company also met with individual interested stakeholders during development of the Phase V Plan to further obtain and discuss their input. During the Phase V Period, the Company plans to continue to conduct stakeholder meetings each year, where the Company will review the performance, progress, and operation of the programs with stakeholders for collaborative discussion and feedback. The Company will also meet with stakeholders on an as-needed, as requested, or on-going basis to discuss any Plan or program aspects. Section 4.1.6 provides a detailed description of this process. Please also refer to Section 1.7, which details how the Company will seek stakeholder input to better reach customers and program allies throughout the plan implementation. Section 1.8 describes the Company's request for periodic feedback regarding data management, quality assurance, and evaluation processes. Additional program specific information regarding stakeholder input is addressed in Section 3.

1.3 *Summary tables of portfolio savings goals, budget, and cost-effectiveness (see Tables 1, 2, 3 and 4 of the EE&C Plan Template Tables Excel Workbook).⁵ Introduce Table 2 with a high-level overview of Act 129 energy accounting (incremental annual, gross vs. net, meter-level savings vs. system-level savings, weather-normalization of savings estimates, etc.). Introduce Tables 3 and 4 with a summary of the key peak demand accounting elements for Phase V (2025 IO at 147-157). FirstEnergy should also provide Table 2a showing the expected first-year MWh and budget by rate district.*

The Company's Phase V goals are shown in FE PA Table 3 below,¹⁶ along with the expenditure level representing the annual spending cap established by Act 129 and is consistent with the budget limits identified in Table 24 of the Final Implementation Order at 232.

¹⁵ See Comments of FirstEnergy Pennsylvania Electric Company to the Tentative Implementation Order Regarding Phase V of the Act 129 Energy Efficiency and Conservation Program, Docket No. M-2025-3052826 (April 7, 2025).

¹⁶ In addition to the tables required by the Commission (which are designated as "PUC Tables" and provided in Appendix B to the Phase V Plan), the Company developed additional tables that have been included as additional support.

FE PA Table 3: Phase V Order Targets

FE PA Table 3: Phase V Order Targets				
EDC	MWh Savings	Low-Income MWh Savings	Demand Reduction MW Savings	Budget (\$M)
FE PA	1,097,605	86,913	191	\$ 390.30

The successful implementation of the Phase V Plan is projected to be cost-effective at the portfolio level as required. Overall, the Phase V Plan is projected to generate Total Discounted Net Lifetime Benefits under the TRC Test of \$120.36 million with a benefit cost ratio of 1.1. Please refer to Appendix B, Table 1 for additional forecasted cost-effectiveness results for the Phase V Plan by program.

Appendix B, Table 2 shows the annual MWh savings, both on an annual incremental basis as well as the lifetime MWh, for the Phase V Period. This data is presented by customer sector. Note that while this table includes information on estimated carryover savings from Phase IV, as required by the Implementation Order, the Phase V Plan is designed to meet the Phase V goals without the use of any carryover. Appendix B, Table 2 also shows that the Phase V Plan is designed to achieve at least 15% of the consumption reduction targets in each program year, and that it is forecasted to achieve 1,116,455 MWh of total savings, exceeding the Phase V goal of 1,097,605 MWh.

Appendix B, Table 2a shows the breakdown of incremental annual savings and annual spending by FE PA's Rate Districts.

Appendix B, Table 3 shows sector specific demand reductions, broken down by coincident peak demand contributions from the EE&C programs and the PDR programs. Note that the accounting of these reductions is consistent with the methodology outlined in the Phase V Implementation Order.¹⁷ Appendix B, Table 3 shows the Phase V Plan is designed to achieve at least 15% of the demand reduction targets in each program year and achieves a total of 191.2 MW demand reduction, exceeding the Phase V goal of 191.0 MW. Note that the Phase V Plan has also been designed to meet the Phase V goals without the use of any carryover.

Appendix B, Table 4 provides a summary of seasonal demand savings identifying peak demand reductions by winter and summer contributions, from the residential and non-residential sectors. The table shows the coincident peak demand reductions from the EE and the DLS program components separately. The Phase V Plan is designed to achieve a minimum of 75% of the target in each season as required by the Implementation Order. Note that the total projected summer and winter demand reductions are projected to be 221.4 MW and 161.1 MW respectively, with the average of 191.2 MW exceeding the target of 191.0 MW.

¹⁷ PA Implementation Order at 147 through 157.

1.4 Summary of program implementation schedule over the five-year plan period. Utilize the Mapping of Program Years to Dates table above to align calendars with Act 129 program years.

The Company plans to issue RFPs for implementation of the programs in the 4th quarter of 2025 and to complete its competitive bidding process, select and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set-up, marketing development, and start-up activities supporting the seamless transition from the Phase IV to Phase V programs with implementation of the Phase V program components beginning June 1, 2026. The Company plans for all program components to be implemented at the beginning of PY18 and continuing through PY22, subject to any program modifications or other adjustments that are made throughout the Phase V Period. See Sections 4.1.2, 4.1.4 and 6.4 for more information regarding potential program modifications and adjustments.

The Company's goal is to maintain the momentum created through programs included in the Phase IV Plan and to leverage the synergies created through implementation of those programs for the Phase V Plan. The Phase V Plan assumes approval of this Plan and CSP contracts in a time frame that allows the Company to seamlessly transition the program components and measures from the Phase IV Plan to the Phase V Plan, noting that: (i) Phase IV transactions will be managed to conclusion concurrent with the introduction of Phase V programs; and (ii) any applications completed for projects installed and commercially operable prior to May 31, 2026, will be included in the Company's documentation supporting the participation towards and compliance with its Phase IV targets.

The Company will use multiple CSPs to transition and implement the various programs identified in the Phase V Plan. These CSPs will be responsible for the design of the transition and start-up plan of the Phase V program offerings and measures that will be performed in an organized and efficient manner and that strives to maintain and strengthen constructive relationships with the Phase V Plan and program management, customers, program allies, and contractors.

The transition and start-up planning includes program set-up activities and will commence following Company selection of the CSP(s) for Phase V. This set-up/start-up planning will outline a process to develop the systems and procedures needed to implement and operate the various program components for the Company. Please reference Section 4.1.5 and Section 4.3 for more detail on the implementation schedule, status of CSP solicitations and the transition and start-up plans for programs from Phase IV to Phase V.

The CSPs' transition and start-up will include communication and coordination with Company personnel and will meet with the Company and its evaluation and tracking system contractors as necessary and appropriate to properly integrate the applicable program components into the Company's overall comprehensive Phase V Plan. The start-up period will include milestone objectives and targets along the timeline to completion of program startup. Consistent with the Phase V Implementation Order, the Company will

not begin implementation of the Phase V programs prior to Commission approval of the program and CSP contracts.

1.5 *Summary description of the EDC implementation strategy to acquire at least 15% of its portfolio consumption reduction and peak demand reduction target in each program year.*

As indicated in Appendix B, Table 2 and Table 4, the Phase V Plan is designed to achieve at least 15% of the consumption reduction and peak demand reduction targets in each program year. The Phase V Plan includes a broad range of measures and services across all customer sectors in order to provide customers' greater opportunities for energy savings solutions that best fit their needs supporting customer participation in the program offerings. The Company plans to issue RFPs for implementation of the programs in the 4th quarter of 2025 and to complete its competitive bidding process, select and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development, and start-up activities supporting implementation of all program components beginning June 1, 2026, to accelerate the program ramp-up period for customer participation normally experienced during the first year of the phase term. In addition, the design of the Phase V Plan and programs, along with the Company's active oversight and inclusion of incentive ranges rather than fixed incentive levels, provides the Company with the awareness and flexibility to timely react to program performance and changing market conditions to best support the ongoing performance of the Phase V Plan towards achievement of the Phase V goals. Please refer to Section 4.1.4 for a more detailed discussion of the plans for monitoring progress and implementing any required intra-course adjustments.

1.6 *Summary description of the EDC implementation strategy to acquire at least 75% of the portfolio MW compliance target in each season. (2025 IO at 142) If an alternative summer or winter performance window is proposed for daily load shifting programs, provide a rationale for the alternative window.¹⁸ If the proposal calls for differentiated windows based on local distribution system needs, summarize the proposed taxonomy and prepare a supplemental table that maps distribution assets or transmission zones to peak demand performance windows. (2025 IO at 154)*

The Company plans to meet its portfolio MW compliance target using a combination of coincident peak demand from its energy efficiency programs as well as verified demand reductions from daily load-shifting and event-based PDR programs. These programs will result in reductions during peak demand hours for both winter and summer peak demand periods. Program CSPs will deploy a combination of daily load-shifting and event-based strategies including behavioral, connected devices, and custom demand response initiatives. In addition to the strategies discussed in Section 1.5 above, targeting a variety of program strategies, technologies, and approaches through experienced CSP(s) helps the Company to mitigate uncertainties with the daily load-shifting design and inclusion of winter demand response for Phase V and provides the required flexibility to make

¹⁸ Alternative windows must still include four performance hours per day.

adjustments over the term of Phase V to meet the Company's goals. See Appendix B, Table 4 that shows a breakdown of these components by customer sector for estimated summer and winter PDR achievements for the Phase V term.

The Company is not proposing alternative performance windows for compliance with the demand reduction targets.

1.7 Summary description of the EDC implementation strategy to manage EE&C programs and engage customers and trade allies.

As discussed above, the Company will contract with CSPs with expertise in providing specific program components and services, including operations and marketing, customer enrollment, and program, subcontractor and trade ally engagement among other things. This network of CSPs reports to the implementation team within the EE&C Team, which provides continuous ongoing oversight of program delivery, including outreach and marketing campaigns, and customer and program ally engagement. Program components and services are actively monitored for performance, and, if needed, adjustments are made to improve results. On a monthly basis, the Company leverages tracking and reporting processes to closely monitor the progress of each program toward its goals individually and for the portfolio collectively, identifying performance issues, gaps, and opportunities for improvement. See Section 4.1.4 for more information.

The Company will also leverage its relationships with various parties through the stakeholder process, seeking input on how to better reach customers and program allies alike throughout implementation of the programs. See Sections 1.2 and 4.1.6 for more information on the Company's stakeholder process and Sections 3.2 through 3.4 for further discussion on how trade allies are integrated throughout the implementation process for each of the programs.

1.8 Summary description of EDC's data management, quality assurance and evaluation processes; include how EE&C programs will be updated and refined based on evaluation results and plans for secure data sharing with other program administrators.

The Company has established effective quality control processes and procedures that it currently utilizes to manage the integrity of its programs offered through the Phase IV Plan. The Company remains committed to designing and implementing robust processes and systems to achieve the energy savings and demand reduction goals established in Act 129 and, where appropriate, will continue to utilize or improve upon those processes already in place.

Sections 5 and 6 present plans regarding data management, quality assurance, and evaluation processes for the Phase V Plan. The Company is committed to working with the SWE to support its efforts evaluating the programs. The Company will conduct both impact and process evaluations to gauge program performance, assess progress toward the achievement of goals, and identify issues requiring intra-course correction. All programs will benefit from periodic feedback from stakeholders and customer satisfaction surveys.

In addition to making implementation adjustments to programs as identified through these feedback channels, the Company will propose any program changes it deems necessary in its annual reporting to the Commission or, alternatively, it will propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Order on Act 129 Energy Efficiency and Conservation Program (entered June 10, 2011 in Docket No. M-2008-2069887) ("Minor Plan Change Order") and as affirmed in the Commission's Phase V Implementation Order at 202.

The Company may gather customer-specific data during the operation of the Phase V Programs and may provide it to its CSPs, the Commission or its contractors, or other parties to support the implementation and EM&V of the Company's programs. The Company is committed to protecting confidential customer data that is shared and any customer-specific data will only be shared after the execution of Non-Disclosure Agreements and Company review and approval of the Commission's and/or third-party's cyber and data security protocols. The Company will enforce privacy and data handling policies and procedures for the Phase V Programs that are consistent with FE PA's customer data security protections, the Final Implementation Order, and any applicable Commission regulations and statutory obligations. Please refer to Tracking and Reporting, Section 5.2.5 for more information regarding secure data sharing.

1.9 *Summary description of cost recovery mechanism. FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class and the rationale for separating or consolidating rate districts from a cost recovery standpoint.*

By Order entered on December 7, 2023, at Docket No. A-2023-3038771 *et al.*,¹⁹ the Commission approved the consolidation of Met-Ed, Penelec, Penn Power, and West Penn Power into Rate Districts within FE PA. For Phase V, the Company proposes to use a consolidated EE&C Charge Phase V Rider ("Phase V EE&C-C Rider") with rates that are expressed as a price per kilowatt-hour ("kWh") for the residential, commercial, and street lighting classes and will be billed accordingly. The industrial class will be billed based upon the individual customer's Peak Load Contribution ("PLC") kW. The Phase V EE&C-C Rider rates will be calculated at the FE PA level, with all Rate Districts being charged at the same rate for each customer class that has been allocated EE&C program costs. The revenues collected through these rates will be reconciled to actual EE&C program costs. The Company proposes that the Phase V EE&C-C Rider rates reflecting the programs and budgets of this Phase V Plan become effective for service rendered on or after June 1, 2026, and continue through May 31, 2031. In addition to recovery and reconciliation of EE&C program costs, the cost of the SWE will be included in the Revenue Requirement, pursuant to the Phase V Implementation Order. The amount of revenues that the Phase V EE&C-C Rider rates can recover associated with the EE&C program costs (excluding the SWE) are

¹⁹ See *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid- Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company, et al.*, Docket Nos. A-2023-3038771, *et al.* (Final Order entered December 7, 2023).

capped by Act 129's 2% spending limit. The Company will submit to the Commission by May 1st of each year a reconciliation of the Phase V EE&C-C Rider.

2. ENERGY-EFFICIENCY PORTFOLIO/PROGRAM SUMMARY TABLES AND CHARTS

2.1 *Market Rate Residential (exclusive of Low-Income), Residential Low-Income, Small Commercial and Industrial, and Large Commercial and Industrial Sector Summaries (see Table 6).*

Please refer to Appendix B, Table 6, for the quantitative Residential, Residential Low-Income, Commercial/Industrial Small, and Commercial/Industrial Large Portfolio Summaries.

2.2 *Plan data: Costs, Cost-effectiveness, and Savings by program, sector, and portfolio (see Tables 1-6).*

Please see Appendix B, Tables 1-6 for the Costs, Cost-effectiveness and Savings by program, sector and portfolio.

2.3 *Budget and Parity Analysis (see Table 7). EDC total annual revenue is inclusive of collections on behalf of Electric Generation Suppliers. (2009 IO at 35) EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total annual sales should include both bundled and delivery-only sales.*

Please reference Appendix B, Table 7 for the Budget and Parity Analysis summary of the portfolio.

3. PROGRAM DESCRIPTIONS

3.1 *Discussion of criteria and process used for selection of programs:*

The Company selected and designed the programs outlined in its EE&C Plan to comply with the Phase V Implementation Order requirements, including:

- Achieving the consumption reduction and demand reduction targets within the allowable budgets;
- Achieving the consumption reduction carve-out from the low-income sector from programs solely directed at low-income customers or low-income verified participants in multifamily housing programs;
- Meeting the budget requirement that at least 50% of all spending is allocated to incentives, and less than 50% is allocated to non-incentive cost categories;
- Including at least one comprehensive program for residential and at least one comprehensive program for non-residential customer classes;

- Offering a well-reasoned and balanced set of measures that are tailored to usage and to the potential for savings and reductions for each customer class; and
- Leveraging external programs and funding to complement the Act 129 programs and encourage further participation within the existing budget constraint.

In setting out to achieve these requirements, the Company pursued the following themes:

- Leverage proven program offerings of the Company and its affiliates in other jurisdictions;
- Align and coordinate program designs, measures, and services with its affiliates where appropriate;
- Incorporate additional program measures or services from other peer utilities or based on the expertise and input from the Company, its affiliates, or its consultant, vendors, and stakeholders;
- Incorporate new program components or measures that are considered promising to target new customer segments, applications or end uses, increase participation or savings, or promote new program concepts or technologies; and
- Establish a program framework that is adaptable and scalable to help the Company meet its energy savings and peak demand reduction targets.

The EE&C Team strove to develop a program framework that not only would meet the Company's targets and requirements for Phase V but also would avoid potential market disruption or confusion from changing program structures between plan cycles. The Company sought to leverage its experience and successes as well as that of its affiliates in other jurisdictions, while seeking opportunities to improve program offerings. The Company endeavored to design a varied portfolio of programs that will be flexible enough to meet an assortment of customer needs, drive customer participation, provide an opportunity for all customers to participate in the programs, and enable the Company to meet its goals. The Company also worked to develop consistent program offerings with its affiliates in other states to leverage economies of scale and target cost savings for its customers.

The Company consolidated its EE&C development efforts for Phase V in alignment with the FIO to achieve cost efficiencies and offer a consistent set of EE&C programs. The EE&C Team also considered program measures and services provided by the Company's affiliates in other jurisdictions and reviewed other existing and potential new program offerings to develop a broad and comprehensive program portfolio. As a result, the EE&C Team created a portfolio of potential program measures and services that draws upon the program offerings of the Company's affiliates and other utilities, other industry programs and measures and incorporates stakeholder, consultant, and vendor input.

The program selection process included the following activities, with several activities encompassing the program development timeline and being performed coincidentally or iteratively:

- The EE&C Team reviewed potential program offerings based on identification by, or feedback from: (i) stakeholders and vendors; (ii) FirstEnergy's energy efficiency implementation team; and (iii) evaluation contractor and energy efficiency consultant. The team also reviewed other industry sources, the PA TRM, and the PA MPS, along with the programs and measures currently being offered through the Existing Plan and by its affiliates and other utilities.
- The potential program measures and services underwent a screening process carried out by the EE&C Team, which included, among other things, consideration of the anticipated participation, implementation requirements, market applicability, savings and cost impacts. Program measures were grouped by: (i) sectors, such as residential and C&I; (ii) end uses, such as appliances and HVAC; and (iii) program types, such as home performance, and efficient products. Potential program components and measures were reviewed with the Company's stakeholders, implementation team, and its energy efficiency consultant.
- Program cost characteristics were developed, including, for example, incentive levels; marketing and vendor costs; incremental measure costs; and the availability of other benefits. The value of benefits was developed from savings estimates or formulas that were included in the PA TRM and the SWE Database for those measures covered, historic actual results, and from other industry sources, primarily including TRMs from other states.
- The economic modeling was completed on an iterative basis, and the savings, cost, and PA TRC values were determined. Once all programs were designed and modeled, the Phase V Plan as a whole was evaluated to balance results and costs to ensure reasonableness and compliance in a cost-effective manner. The results from the PA MPS were also used to refine the program designs and assumptions. The projections and results were reviewed with the Company's implementation team and energy efficiency consultant, incorporating, when appropriate, suggestions for refinement. The PA TRC results for each of the programs included in this plan can be found in Appendix B, Table 14.

Program designs were then finalized based on consideration of each programs' component and measure contributions to meeting the Commission's and Company's requirements and objectives for the Phase V Plan.

3.1.1 Describe portfolio objectives and metrics that define program success (e.g., energy and demand savings, customers served, number of units installed, market transformation).

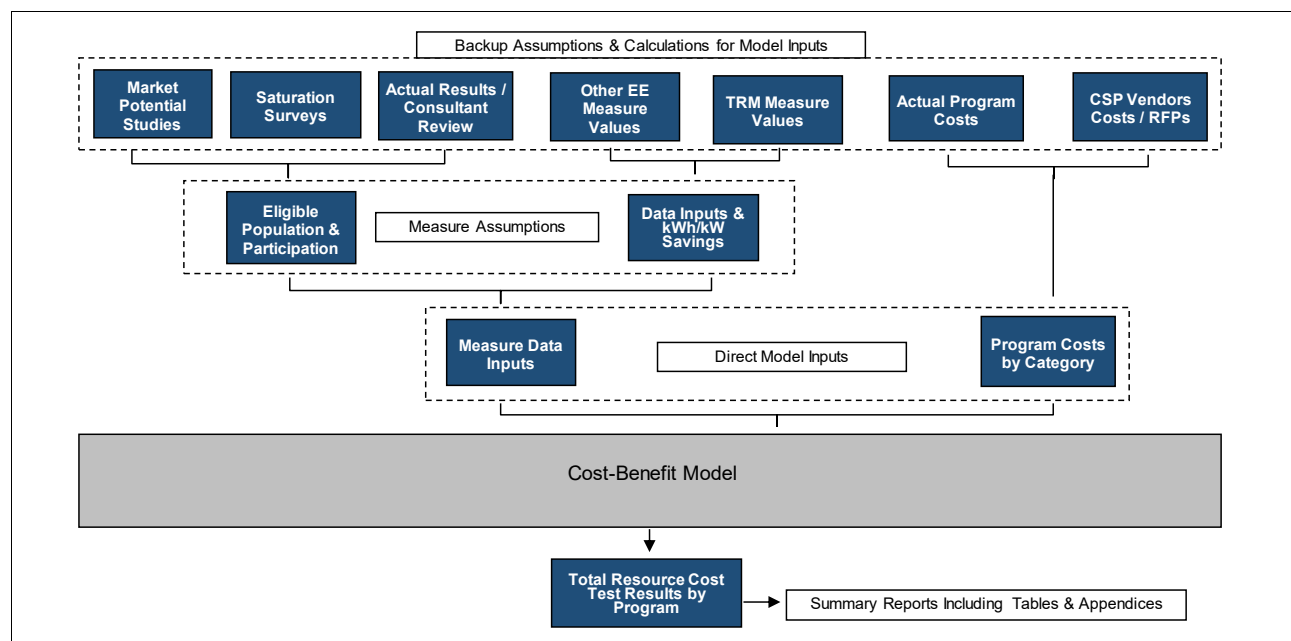
The portfolio design criteria and objectives are discussed in Section 3.1 above. General metrics that define success for each program are associated with the number of participants, kWh savings, kW reductions, dollars spent and cost-effectiveness. See Appendices B and D for the projected metrics associated with the Company's EE&C Plan and programs.

3.1.2 Describe how programs were constructed for each sector to provide market coverage sufficient to reach overall energy and demand savings goals. Describe analyses and/or

research that were performed (e.g., benchmarking of other jurisdictions, best practices, requests for information from CSPs).

Figure 2 presents a schematic diagram of the analyses the EE&C Team used to develop the EE&C Plan, based on available information, experience of the Company and its affiliates and input from the Company’s consultant and stakeholders.

FE PA Figure 2: Model Process Diagram



The Company utilized a comprehensive bottom-up approach in designing the programs and selecting measures for inclusion in the Phase V Plan. Under this approach, the EE&C Team identified potential measures from extensive sources including but not limited to the Electric Power Research Institute (“EPRI”), ENERGY STAR, ESource, other utilities, other jurisdictions, and input from vendors, the Company’s EE&C consultant, CSPs and stakeholders. The EE&C Team established measure eligibility in consideration of the PA TRM, industry ratings such as ENERGY STAR, the Consortium for Energy Efficiency (“CEE”) and other efficiency ratings.

The Company primarily utilized the PA TRM to quantify the energy and demand savings, the “measure life” and other assumptions of the measures included in the Phase V Plan. The PA TRM has been updated for Phase V based on actual data where available, and with input of stakeholders with extensive experience in EE&C programs. In limited cases where the PA TRM did not cover a proposed measure, the Company utilized estimates based on other TRMs and sources as listed in Appendix C, FE PA Table C-2. The Company also utilized these TRMs, the SWE Database or Company calculation, as the source of the incremental costs of measures included in the Phase V Plan. The incentive values are based

on targeting a portion of the incremental cost of the energy efficient equipment versus equipment meeting current standards, with consideration of the current programs, similar programs offered in other jurisdictions, equipment cost and customer payback. For program modeling, the most recent realization rates were incorporated as established by evaluation for the current programs or similar program offerings in other jurisdictions.

The EE&C Team developed the projected participation rates for the proposed portfolio of programs and measures through a multiple step process that considered several factors as discussed in Section 1.2. Iterative refinements included assessing the reasonableness of the projected results based on factors such as, but not limited to, number of customers, estimated costs and savings. Final refinement considered logical and intuitive feasibility about the program and measure assumptions and adjustments were made as necessary, rebalancing the portfolio as appropriate to meet all requirements in accordance with the Final Implementation Order.

3.1.3 Describe how different components such as energy-efficiency, combined heat and power, renewables, load-shifting, and other measures are included in the portfolio of programs as applicable.

Sections 3.2, 3.3, and 3.4 present individual program descriptions. The Residential Energy Solutions Program includes measures for geothermal heat pumps and solar equipment. Similarly, the C&I Energy Solutions Programs, Small and Large, includes measures for geothermal heat pumps, combined heat and power (“CHP”), solar and other energy efficiency, and renewable projects through its Prescriptive and Custom measures. Both Residential and C&I Energy Solutions Programs include load shifting and peak demand reduction measures. See Appendix B, Table 8 for the eligible measures, incentives, and rebate amounts.

3.1.4 If the plan includes measures that promote fuel switching from electricity to fossil fuel, include a proposed minimum standard and provide justification for the threshold to receive program support. Combined heat and power projects are considered fuel switching. (TRC Test Order at 84)

The Phase V Plan includes measures for combined heat and power projects and custom projects which may involve fuel switching from electricity to fossil fuel. The Company will follow all applicable protocols defined in the TRM, evaluation guidance and TRC Test Order to arrive at verified savings and cost-effectiveness for these projects. The minimum standard required for program eligibility is based on positive net energy savings for gas and electric energy in MMBtu's and meeting other program requirements (e.g. usage, size and cost-effectiveness).

3.1.5 Confirm that the plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR and other non-Act 129 program participants. (2025 IO at 174) Describe how program delivery will target these bundled, or interwoven, funding opportunities for measures that encourage fuel switching from fossil fuels to electricity. Summarize how efficiency requirements or qualified product lists for heat pumps and heat pump water heaters will be aligned with non-Act 129 programs.

The Phase V Plan includes energy efficient heat pump and heat pump water heaters across all customer sectors, including Residential, Low-Income, Multi-family (classified as Residential, SCI and LCI), SCI and LCI. Customers who implement these technologies under the Home Electrification and Appliances Rebate (“HEAR”) program may qualify for the Company’s program incentives, should they meet the program and incentive eligibility requirements as defined by the Company’s Plan and programs, and in accordance with the PA TRM. As discussed in more detail in Section 4.2.2, the Company’s program implementation CSPs will provide program and customer education and marketing materials to promote other conservation programs such as HEAR and the braided incentive opportunities for qualifying measures, in conjunction with its programs. Such education and marketing materials will communicate the efficiency requirements, and the Company also anticipates providing aligned incentives or incentive tiers for applicable measures to align with applicable non-Act 129 program eligibility requirements to further support braiding funding.

3.1.6 Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan and the expected contribution to portfolio MWh and MW savings and disclose all non-Act 129 funding sources the EDC plans to leverage for FTM measure installation. Note that the contribution of FTM measures is limited to ten percent of total plan savings. (2025 IO at 78)

FTM measures are included in the Residential, SCI, and LCI sectors of the Phase V Plan. The primary objective of the FTM components is to promote and achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and help mitigate growing resource adequacy concerns in the State. While the Phase V Plan was designed to achieve the Company’s goals with no energy savings or demand reductions from FTM measures, the Company intends to identify and promote energy efficiency and demand reductions through Company and other project developer initiatives implemented during the course of Phase V supporting achieving energy savings and system load relief, including but not limited to the Company’s Long Term Infrastructure Improvement Plan(s) (“LTIIP”), its Operation and Maintenance (“O&M”) plans, and other Company or other project developer initiatives. The Company will review FTM measures that it identifies to include in its Plan, including costs, projected energy and demand savings by sector and EM&V protocols, with interested parties ninety (90) days prior to their implementation during Phase V, and will consider and respond to any comments provided by the parties.

Under the FTM program component, the Company will engage and coordinate with these FTM initiatives to target energy savings and peak load reductions from the corresponding

improvements. The Phase V Plan budget includes the costs associated with the Company's EE&C department identifying, promoting, and coordinating with the implementation of applicable Company and other project developer initiatives. The Company will assign FTM savings and costs to the appropriate customer classes based on energy savings, except that no FTM savings will be assigned or allocated to the low-income savings carve-out requirement, and no costs will be assigned to the low-income program. The Company will limit the contribution of FTM measures to ten percent of the total Plan savings in accordance with the Phase V Implementation Order.

See Sections 3.2, 3.4, and 3.5 for more information on these initiatives.

3.1.7 Describe how the EDC defines “comprehensive” in the context of EE&C plan design and delivery and the comprehensive program(s) to be offered to the residential and non-residential rate classes. Describe the measure mix or delivery mechanism that qualifies each program as comprehensive consistent with the requirements of the Phase V Implementation Order. Refer to the “Table 8 Addendum” in the Microsoft Excel version of the template tables for a list of residential measures designated as “comprehensive.” (2025 IO at 49-52 and 72)

The Company considers measures and/or combination of measures or projects, including whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions such as but not limited to weatherization, HVAC, custom retrofit projects and energy management initiatives to be comprehensive. The Company's Residential, Low-Income and Commercial and Industrial Energy Solutions programs are comprehensive programs that targets long-lasting energy savings through comprehensive and whole home whole building solutions. See Appendix B, Table 8 for a complete list of measure offerings in the Phase V Plan that are considered to be comprehensive.

3.1.8 If Time of Use rate(s) are part of the portfolio, describe how Act 129 support will lead to improved outcomes over simply offering the time-varying tariff through rates. (2025 IO at 124)

The Company has included Behavioral program components in its Residential Energy Solutions Program to target achieving behavioral energy efficiency and coincident peak demand reductions. The Company plans to provide ongoing communication and education on its Time of Use (“TOU”) rates and the customer's energy usage through the Behavioral program components. These communications will promote, educate and coach customers on their participation in TOU rates to help customers save money and drive persistent peak demand reductions.

3.2 Residential Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the following headings:

The table below summarizes the residential programs included in the Phase V Plan, along with a description of each program:

FE PA Table 4: Residential Program & Descriptions

FE PA Table 4: Residential Programs & Descriptions	
Proposed Phase V Program	Program Description
Residential Programs	
Residential Energy Solutions Program	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.
Residential Low-Income Programs	
Low Income Energy Efficiency Program	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.

Below are the program descriptions for the Residential sector included in the Phase V Plan:

Program Name and Program years during which program will be implemented

Residential Energy Solutions Program

Program years during which program will be implemented-

June 2026 - May 2031

Objective(s)

The primary objective of the program is to educate customers on energy efficiency to promote adoption of energy efficiency and conservation mindsets and measures, to have customers adopt energy savings behaviors, to promote the purchase and installation of energy efficient products, to remove older inefficient operating appliances from customer homes (to prevent them from being maintained as a second unit or transferred to another customer), to encourage customers to retrofit existing technologies with more efficient ones, to encourage residential developers, builders, and contractors to build energy efficient new homes, and to promote other energy efficiency opportunities to customers that conserve and save energy in their homes.

This program includes a FTM component. The primary objective of the FTM component of this program is to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and can help mitigate growing resource adequacy concerns in the State.

This program also includes a DLS and PDR component. The objective of the DLS & PDR program component is to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. This component includes a combination of event based and daily load shifting strategies including but not limited to behavioral daily load shifting, behavioral demand response, connected device load shifting and demand response and custom demand response tailored to customer opportunities.

Target market – including market size to help frame participation estimates (e.g., number of households, electric sales etc.)

For the EE&C Program Components, the target market generally includes all residential customers of the Company that have program eligible applications or meet other program prerequisites. More specifically, the Company has 1.8 million residential customers and the target market for this program ranges from the Behavioral component which typically applies to a large percentage of the customer population to comprehensive measures offerings that, due to their measure life, generally apply to a smaller subset of the total customer base.

For the Daily Load-Shifting and Peak Demand Reduction Component, the target market are customers with behavioral opportunities or qualifying connected devices. Similar to the EE&C program components, the behavioral components apply to a larger portion of the population while the connected device component requires program eligible equipment (e.g. customers with smart thermostat controlled electric HVAC, batteries, EV's) that applies to smaller subsets based on the saturation of these devices.

The Company developed participation projections in consideration of many factors (e.g. historical performance, input from its Consultant, implementation team and other stakeholders, etc.) as

discussed in Section 1.2 which inherently incorporates the target market for each of the program components and measures. See Appendix B, Table 9 for a list of participation assumptions by measure.

If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports

Program description

The Residential Energy Solutions program is an umbrella program that engages customers through multiple program components to provide energy efficiency and energy usage education and awareness. The program is designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels and also provides a means to encourage customers to take steps toward energy-efficiency in their homes as well as to install comprehensive measures and whole home solutions through promoting or providing access to efficient measures, recommendations, and/or incentives. The program provides the following program components to customers:

Products:

- Product Rebates: This subcomponent promotes the purchase and installation of efficient residential products. The component will provide incentives for energy efficient appliances, as well as other energy efficient products. These incentives will be offered through a variety of channels including downstream rebates to customers, reduced point of sale costs, an instant rebate through a dedicated website, and midstream or upstream incentives and support for manufacturers, distributors, and retailers that sell qualifying energy efficient products. This program component will provide marketing support and education to customers, retailers, and other program allies on qualifying energy efficient products.
- Appliance Recycling: This subcomponent provides an incentive, pick-up, and recycle service to customers for turning in qualifying, inefficient, operating appliances. Qualifying appliances will be picked up at the customer's residence or other drop-off locations and recycled in a compliance with the U.S. Environmental Protection Agency's ("EPA") Responsible Appliance Disposal ("RAD") program criteria. In addition, periodic events may be offered at centralized drop-off locations where customers can drop off smaller qualified inefficient operating appliances such as, but not limited to, dehumidifiers and room air conditioners.
- Agricultural: The Agricultural subcomponent provides prescriptive and custom-based incentives for efficient agricultural equipment. This program component will support and/or provide downstream approaches and may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors and retailers

that sell qualifying energy efficient agricultural products. Incentives will be offered for individual measures and retrofit projects.

HVAC and Solar:

- This component promotes the purchase and installation of qualifying energy efficient HVAC and solar photovoltaic (“PV”) equipment at residential homes. This component provides incentives to customers through a variety of channels which may include downstream rebates, reduced point of sale costs, midstream/upstream incentives and support for contractors, distributors, manufacturers, and/or retailers that sell and/or maintain qualifying energy efficient HVAC products and solar PV equipment. The program component also provides promotional support such as point-of-sale materials, training, and sponsorship of and participation in promotional events to highlight the benefits of the purchase, installation, and/or maintenance of energy efficient HVAC products and solar PV equipment.

Behavioral:

- The Behavioral component educates customers regarding their home energy usage and provides recommendations to implement and adopt energy efficiency and conservation measures to reduce their energy usage and peak demand. This component provides customized home energy reports about each customer’s energy usage, as well as analysis regarding their usage over time, with specific tips and recommendations that promote energy efficiency and conservation and peak demand reduction opportunities and additional program offerings available to them. The reports help customers understand how their energy consumption compares to similarly sized and equipped homes; understand how their energy use changes over time and across seasons; and develop goals and strategies to reduce their energy use and load during peak periods. This program component also offers an online audit tool that similarly provides recommendations for home energy efficiency and conservation opportunities and information regarding other programs that may benefit the customer. The online audit tool converts the customers’ input of their energy usage characteristics into information the customers can understand and act upon, such as the cost of heating and cooling their homes, a usage comparison graph, and tips on how to save energy.

Comprehensive Audit:

- The Comprehensive Audits component provides a customer with a comprehensive audit with direct installation of measures performed by Building Professional Institute (“BPI”) Certified auditors. The audit includes a diagnostic test of the home’s air infiltration, plus a customized report that provides recommendations for home energy efficiency improvements such as but not limited to insulation, air sealing and duct sealing. The program component provides financial incentives towards the installation of qualified comprehensive measures, including but not limited to HVAC and solar PV.

Multifamily:

- The Multifamily component provides energy efficiency education to multifamily building owners and building tenants while completing energy assessments, installing standard energy savings measures, and recommending energy efficiency improvements. This program component will provide financial incentives towards the installation of qualified comprehensive energy savings opportunities, including prescriptive equipment replacement and custom retrofit projects, including but not limited to, insulation, air sealing, duct sealing, heat pumps, heat pump water heaters, and residential appliances.

New Homes:

- The New Homes component provides incentives to builders for achieving energy efficiency savings and targets through a combination of building shell and installed measures, including appliance and equipment upgrades. To qualify for this component, the builder must construct the home to meet the energy efficiency requirements established by the ENERGY STAR program or build at a higher efficiency level than the currently adopted building code.

Front-Of-The-Meter (“FTM”):

- Through implementation of upgraded designs, equipment and operation of the Company’s energy delivery system, the FTM component will deliver system energy savings and peak load reductions. Company and project developer initiatives supporting such system load relief include but are not limited to the Company’s LTIP, its O&M plans, and other Company or project developer initiatives. Under the FTM program component, the Company will coordinate with these FTM initiatives and operations to target energy savings and peak load reductions from the corresponding improvements.

Potential improvements that can provide energy savings and peak load reductions include but are not limited to: replacement of and upgrades to energy delivery equipment, voltage optimization (e.g., Conservation Voltage Reduction (“CVR”)), efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar PV projects that are not associated with an existing retail meter.

Daily Load Shifting (“DLS”) and Peak Demand Reduction (“PDR”): The Residential DLS & PDR program component is comprised of two program subcomponents - Connected Devices and Behavioral. Each subcomponent is designed to deliver load reductions on a daily and peak day event basis.

- Connected Devices: Participating customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods. This subcomponent includes customers’ smart thermostats for control of heating, ventilation and air conditioning equipment, managed charging of electric vehicles, battery storage or other customer equipment to reduce load of connected devices during peak load periods. This subcomponent will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance.

- Behavioral: The Behavioral subcomponent will encourage residential customers to reduce load during peak load hours on a daily and/or peak day event basis during the PA Act 129 summer and winter peak load periods through messaging and education. Messaging and education may include bill alerts, Time-of-Use (TOU) education associated with their energy usage, and TOU rate and EV coaching so that customers with electric vehicles can better understand the value of switching to TOU rates. Customers will be able to opt-out of the program component at any time.

If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.

The Company considers the Residential Energy Solutions Program to be a comprehensive program. The program provides measures and/or combination of measures or projects, including whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions. More specifically, the program promotes and provides comprehensive measures to residential customers, including both an assortment of individual comprehensive measures as well as whole house treatments. The program includes home audits with additional incentives for comprehensive home retrofits as well as incentives for efficient new home construction. These home retrofit and new construction measures engage builders, developers, contractors, and program allies in providing comprehensive measures and projects across the residential sector.

Multiple measures included in this program have long-lasting expected useful lives and that result in deep savings are considered to be comprehensive, and include program measures such as HVAC equipment (e.g. heat pumps, air conditioners), appliances (e.g. heat pump water heaters) new construction, weatherization, solar PV, etc. Several other program measures provide opportunities for prescriptive equipment, and direct install so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase the efficiency and operation of their home, and program components also provide opportunities for customers interested in whole home/comprehensive solutions. See Appendix B, Table 8 for a list of measures that are identified as comprehensive.

Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.

With oversight from the Company, the CSP(s) hired by the Company to implement the Residential Energy Solutions Program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and also other Act 129 programs where applicable. The program components will be cross-marketed, where practical, in conjunction with the other Residential Energy Solutions Program component offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings opportunities to customers. For example, in the case of the Behavior Component, the customer home energy reports are configured with marketing modules that promote additional residential program offerings. The Company will assess cross-participation by

home energy report recipients in other residential energy efficiency programs through evaluation of the program and will leverage this information to encourage participation in the other residential program offerings.

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding program and measure eligibility, incentives, and other program details to promote and market program opportunities to customers. As part of these activities, time will be spent detailing the various program components as well as other applicable Act 129 programs that may provide additional savings and increased participation opportunities for the Company's customers.

Implementation strategy (including expected changes that may occur in different program years)

The Company will perform overall administration and oversight and will contract with implementation CSP(s) who will directly administer and manage delivery of the program components. Implementation activities include, but are not limited to, marketing the program through multiple channels, providing customer education and awareness of the program components or their participation, validating customer eligibility, processing incentives, conducting outreach to and securing partnerships with retailers, wholesalers, distributors, manufacturers and trade. Customer engagement, sales channels, and program component strategies may include:

- Post Purchase (Downstream) Rebate applications will be available online and/or in stores to submit either electronically or in hard copy with proof-of-purchase for qualifying equipment.
- Point of Sale Rebates: Prescriptive rebates will be made available at the point of sale for selected products. Point of sale rebates are paid to a retailer or manufacturer who apply the rebate to reduce the retail price paid by the residential customer in the retail store.
- Appliance Recycling: Incentives will be provided to customers for recycling qualifying, inefficient, operating appliances. Offering an incentive for the drop-off or pick-up and removal of an appliance prevents the appliance from being maintained as a second unit or being transferred to another customer. Customers can schedule an appointment by phone or online, or with participation at a drop-off location.
- Midstream or Upstream Rebates: Midstream and/or upstream rebate channels may be offered for select equipment to encourage purchase of energy efficient products. The Company will work with retail partners (such as Home Depot, Lowe's, etc.), distributors, and/or manufacturers to assure that measures are available throughout their footprint. Midstream or upstream rebates encourage market transformation and wider availability of efficient equipment.
- Behavioral: The CSP will conduct the energy usage analysis and develop and deliver customized home energy reports to customers by mail and/or email. The home energy reports will provide customers with meaningful comparisons regarding their energy usage relative to a peer group, based on home location, size, and other criteria. The reports deliver information in a simple way, providing customers with the necessary information to take

appropriate actions to reduce their energy use, along with marketing modules that promote additional residential offerings. Customers will also have access to online functionality provided under the program component that customers can easily utilize to see additional tips on how to save energy and review their historical usage. For the online audit, the Company plans to utilize its enterprise-wide Online Audit tool.

- **Comprehensive Audit:** The CSP will be responsible for the implementation of the program, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP will engage trade allies such as insulation, weatherization, heating and cooling contractors who will be recruited to partner in this program component in addition to BPI Certified auditors. The CSP will utilize the trade allies' network to further promote comprehensive retrofits and incentives.
- **Multifamily:** The CSP will be responsible for the implementation of the program, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP will engage trade allies, such as insulation, weatherization, heating, and cooling contractors, who will be recruited to partner in this program component in addition to professional or BPI Certified auditors. The CSP will utilize the trade allies' network to further promote comprehensive retrofits and incentives.
- **New Construction:** The CSP will be responsible for marketing activities, such as educational materials, promotional brochures, and presentations, to target and conduct outreach to home builders to inform them of the program offering, components, and benefits and to achieve program buy-in and their participation. This program supports implementation of builder or contractor-installed energy efficient appliances, HVAC, and other eligible systems and equipment in new residential homes, as well as measures addressing building shell and other energy consuming features.
- **Trade Allies:** The Company will establish a network of trade allies to promote certain measures of the program component to the customer where applicable. The trade ally network will consist of qualified installation contractors and other trade service professionals. Trade allies will be able to leverage the program and offer customers rebates through their normal course of business.
- **Front-Of-The-Meter:** The Company will coordinate with its engineering, operations, and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.
- **Daily Load-Shifting and Peak Demand Reduction:** The Company plans to contract with experienced CSP(s) to implement the various components supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program component. The Company will perform overall administration and oversight of the program.

By developing relationships with both program and trade allies, the program will develop a broad reach across the marketplace and solicit feedback to ensure incentives and measures are impacting the market as designed. The Company's implementation CSP(s) will work with program and trade allies supporting their participation and installation of qualified energy efficient products. Targeted program and trade allies may include:

- Efficient equipment retailers, distributors, and manufacturers
- HVAC, appliance, and solar contractors and installers
- General contractors, plumbers, electricians, and other trade service professionals

The Company anticipates federal standard changes may become effective during the Phase V Period and if so, will need to adjust its program implementation, marketing and other program processes in conjunction with these changes as they become effective following the PA TRM or other evaluation guidance. Please refer to Section 6.6 for more information regarding changes to federal standards and how these are considered in the Company's Plan.

Appliance Recycling will be delivered through an implementation CSP that specializes in proper appliance recycling. The CSP will be responsible for marketing, scheduling appointments, picking up / recycling of qualified working appliances, coordinating pickup of smaller qualified inefficient operating appliances at centralized drop-off locations, processing rebates, and handling customer inquiries. The CSP will also market, schedule, staff, and manage the pick-up and recycling of qualified working appliances at special events. Each unit collected is disposed of in an environmentally responsible way, in compliance with EPA's RAD criteria. The Company will perform overall administration and oversight of the component.

For the FTM program component, the Company will coordinate with its engineering, operations and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.

For the DLS and PDR program component, the Company plans to contract with experienced CSP(s) to implement the various subcomponents supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program. The Company will perform overall administration and oversight of the program.

Leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. The CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to relevant program components. The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to the Inflation Reduction Act ("IRA") of 2022 IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. Please reference Section 4.4 for additional information.

Program issues and risks and risk management strategy

The risks associated with this program are primarily obtaining sufficient customers to participate in the various program components. Well-established and innovative outreach and marketing techniques will be used to promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company's budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from certain end uses (e.g. Solar) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other lower-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to the program components include:

- **Initial Cost of Energy Efficient Products and or Home Retrofits:** Relative to the market baseline, energy efficient products often carry a higher upfront cost but a lower lifetime operating cost, and home retrofits are more expensive and more involved than purchasing efficient equipment. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to also lead to higher upfronts costs for efficient equipment. Therefore, customers may not appreciate the lifetime operating cost advantage of energy efficient products and, consequently, a higher upfront cost is a barrier to purchasing energy efficient products. Home retrofits often require more participant investment, time and commitment, and thus this additional investment and commitment is a barrier. To address these barriers, the company is working to ensure incentives align with incremental costs to help reduce the initial cost of equipment and retrofits.
- **Customer Awareness and Engagement:** Residential customers may not be aware of the benefits of installing energy efficient opportunities and products for their home, and/or lack the time and resources to pursue energy efficient products when replacing existing equipment. To address this barrier, the Company will educate customers on the benefits of installing energy efficient products through targeted marketing, ensure that incentives are easily accessible, and encourage market transformation and stocking of energy efficient products through midstream incentives. Educational materials will focus on the lower operating costs and the savings customers may obtain from making the choice to purchase eligible high efficiency products. Through outreach efforts, the Company will seek to partner with retail and wholesale entities to promote program offerings, to coordinate with other conservation programs, and also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of available incentives. The Company will cross-promote programs to spread awareness of the range of energy efficiency opportunities and incentives proposed in this Plan.

- **Sufficient Stocking and Availability of Energy Efficient Products:** The Company will look for opportunities to develop and promote a midstream component for specific products to encourage high levels of participation by incenting midstream market actors and/or directly discounting the cost of the energy efficient products at the time of sale. In addition, stocking and availability of energy efficient products may be challenged in relation to supply chain disruptions resulting from potential policy decisions related to newly imposed tariffs.
- **Trade Ally Awareness and Training:** To meet certain program component participation goals, sufficient contractors must be available to undertake the work. The Company will work with the implementation CSP(s) to address this barrier by trying to engage and recruit more program and trade allies to participate in select program components.
- **Daily Load-Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty with customer participation and program component performance in the DLS program design and for winter demand response. More specifically, it is unknown how customers and the program components will perform in daily load-shifting across over 400 hours per year and in the winter period, both of which are new to PA and across the industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

Additional risks include the measurement and verification of the peak load reduction impacts given new methodologies and protocols for daily load-shifting. The CSP(s) for the program components will be required to monitor progress for participation and impacts, and to provide contingency associated with customer non-response, opt-outs or lower verified impacts. The CSP will also be required to provide reporting to the Company detailing its performance and to promptly react to any deficiencies.

The Company and the implementation CSP(s) will monitor program participation and performance through feedback channels to assess, where applicable, the effectiveness of program design, delivery methods, outreach efforts, incentive levels, marketing/advertising, program and trade ally suggestions, or other improvement opportunities to overcome barriers to program success. Please refer to Section 4.1.2 for more information on potential risks and the Company's anticipated risk mitigation strategies.

Anticipated costs to participating customers

Customers will have to pay the balance of energy-efficient equipment, products, and installation costs not covered by the rebate. Please review Appendix B, Table 7 for the incremental cost and incentive range for each measure in this program.

There are no incremental costs to customers associated with FTM EE&C measures included in this program. For DLS and PDR program components, there are no known anticipated costs for customers to participate, as this component primarily targets behavioral or operational changes and utilization of existing customer equipment for participation.

Ramp up strategy

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program components being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. Kindly reference discussion in Section 1.4 and 4.1.5 for more details on ramp up.

For the DLS and PDR program component, since demand response programs were not offered in Phase IV and daily load shifting and winter demand response are new concepts for Act 129, it is anticipated that it will take four to six-months to start-and ramp up the DR program offerings. Because of this ramp up period, the Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026. This supports the CSP obtaining customer enrollments such that the Load Shifting and Peak Demand Reduction program component can begin implementation June 1, 2026. Refer to the discussion in Section 1.4 for more details on ramp up.

Marketing strategy

EE&C Program Components:

In general, the Company's implementation CSP(s) will develop and administer the marketing plan for each program component. Both multi-pronged direct and indirect marketing campaigns will be implemented to promote the program components. Customers will be provided broad-based energy efficiency awareness campaigns, including but not limited to, web-based engagement and information, digital advertising, social media, hard-copy materials, and the Company's website to promote awareness, as well as tie-ins with other programs. In addition, the Company may utilize school and community based educational and promotional offerings to raise awareness of energy saving opportunities, including giveaways, handouts, and takeaways.

Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the program components where applicable. A combination of strategies and approaches will be used to train and support retailers, distributors, and other program allies such as media advertising, outreach community forums, events, and direct outreach to customers. Further, the program components will be cross marketed, where practical, in conjunction with the online audit, residential audit, and home energy report offerings.

The CSP(s) for the Comprehensive Audit and Multifamily program components will also market and promote comprehensive retrofits to customers, including the cost-saving benefits, information on typical payback timeframes and rebates. In addition, each participant will be provided applications and marketing materials for other applicable program offerings at the time of the audit. The CSP(s) will attempt to follow up with participants to measure satisfaction with the program component in general and with delivery personnel. The CSP(s) will also identify customers who did not complete additional retrofit measures to understand the barriers to moving forward with comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program delivery. The marketing strategy for the Multifamily program component will focus on informing property owners, managers, associations, tenant groups, municipalities, and community organizations about the availability and benefits of the component and how to participate. More specifically, the CSP will develop and disseminate clear information and program marketing materials to multifamily property managers regarding the measures, incentives, and cost sharing requirements that will be available to them to improve the energy efficiency of their properties. The Company will share this information and program marketing materials at its stakeholder meetings.

The CSP for the New Homes program component will target home builders, Home Energy Rating System (“HERS”) raters, and eligible customers to inform them of the program offering and the associated benefits through education via discussions, newsletters, and e-mails to the building community and through the Company’s website. The CSP will actively recruit participants through existing builder and rater partners, other utility programs, local home builder associations (“HBAs”), green building programs, and other allies who have established relationships within the residential construction community.

EE&C Program Component Marketing activities may include:

- Point of purchase displays and materials and special “instant sales events” or limited time offers.
- Targeted outreach through direct mailings and presentations to inform customers, builders, developers, property owners, property managers, apartment associations, tenant groups, municipalities, and community organizations about the benefits of the program offerings and participation processes.
- Brochures that describe the benefits and features of the program components as well as the enrollment and participation processes. The brochures will be available for various public awareness events (community events, presentations, seminars, etc.).

- Bill inserts, bill messages, email, direct mail, social media platforms, billboards, and pop-up stores.
- Company website content providing program component information resources, contact information, online application forms and links to other relevant service and information resources.
- Customer representatives trained to promote the program components to customers.
- Energy assessments of properties that may include the direct installation of standard energy savings measures or giveaways to engage, educate, and promote participation by the customer, building owner, or facility manager in the other program component offerings, thereby targeting deeper savings.
- School and community-based engagement events, energy efficiency awareness programs, promotional initiatives, and energy saving giveaways.

Daily Load-Shifting and Peak Demand Reduction Program Component:

The marketing of this component will be provided by the CSP(s) under the direction of Company personnel. Marketing activities will inform customers of the component offerings and the benefits of participation. For the DLS and PPDR component of the program, the Company or the CSP may also recruit device manufacturers, providers, and other program allies throughout implementation to promote and achieve customer participation. The Company or the CSP may also market and/or cross market the component offerings to customers in conjunction with or through other Company EE&C program component offerings (e.g. smart thermostat rebates).

**Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., \$ per measure, \$ per kWh or MW saved)
See Table 8**

Please refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the Phase V Period, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications that are available from participating retailers, the program website, or participating contractors;
- Online rebate forms or instant rebates through a dedicated website;
- Midstream/upstream incentives provided through participating distributors and/or retail outlets; and
- For DLS and PDR subcomponents - Initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year.

In instances where incentives are not immediately available, the Company will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the right to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual reports.

For the DLS and PDR program component, diesel and other fossil fuel backup generators are excluded from eligibility, so long as such exclusion does not impede the Company's ability to meet its targets. In all cases, customers who receive incentives from the DLS and PDR program component will be required to comply with local air quality standards.

For the FTM program component, eligible measures include energy delivery system upgrades, installation of equipment (e.g., solar or energy storage equipment) on the energy delivery system, or enhanced system operations that achieve energy savings and peak load reductions. There are no incentives associated with FTM EE&C measures included in the Company's Plan.

The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC

For EE&C component offerings, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon program performance, customer response and market conditions over the Phase V Plan period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultant, or CSPs, stakeholder input, and industry benchmarking. Incentives will vary depending on factors including but not limited to the specific program component, end-use and measure, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace.

For the DLS and PDR component of this program, the proposed level of incentives is primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company.

Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be postmarked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all project measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

Key schedule milestones

As discussed under the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- November 26, 2025: Phase V Plan filed with the PA PUC
- December 12, 2025: RFP issued for program implementation CSP(s)
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program to begin implementation, 2026

Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide Evaluator (SWE)

The Company's CSP for EM&V services will be required to perform evaluation, measurement, and verification of the program in accordance with the state's Evaluation Framework. Anticipated activities for this program may include:

Products:

- Verify that qualified products have been sold by participating retailers, contractors, distributors, or manufacturers seeking payment of incentives by auditing a sample of their claims.
- Verify that new, more efficient products have been installed or projects completed through review of documentation provided by participating retailers, contractors, distributors, or manufacturers, as well as individual participant rebate applications.

Appliance Recycling:

- Verify that the planned number of targeted appliances are collected and properly recycled and that the calculations of kWh and kW savings from appliance retirement are accurate and compliant with applicable requirements including those contained in the TRM.

Behavioral:

- Program impacts will be measured through billing analysis with a randomized control trial approach in accordance with the PA Evaluation Framework. The EM&V Contractor will perform participation uplift adjustments and avoided decay calculations in accordance with the PA TRM and SWE guidance.

Comprehensive Audit and Multifamily:

- Verify that the planned number of each type of audit is performed on time and within budget. A sample of audits will be reviewed to check that their actual costs do not exceed the contract cost and that customers are satisfied with the service.
- Verify that existing EE&C opportunities are properly quantified to enable accurate tracking and documentation of energy efficiency and demand reduction.
- For installed measures and retrofit projects, verify that the installed measures and comprehensive diagnostics are performed as supported on program applications.

New Homes:

- Select a representative sample of homes for comprehensive measurement and verification, including reviewing both the baseline and as-built home properties as documented in a RESNET accredited building simulation program.
- Verify the models and their associated impacts for sampled homes through on-site data collection. Gather as-built data through independent on-site visits and review of data gathered during quality assurance / quality control visits.

Front-Of-The-Meter:

- For the FTM component of this program, the Company, in coordination with its EM&V CSP, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions in accordance with applicable evaluation guidance and will include the results in its subsequent semi-annual reports. This will include a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.

DLS and PDR:

- The connected device subcomponent of the DLS and PDR program component will utilize AMI and/or device data analytics to evaluate the usage reduction during peak load events. For the residential behavioral subcomponent, as with other behavior programs, eligible participating customers and control groups will be randomly selected to support performance evaluation. Hourly data of the behavioral participant and control group(s) will be evaluated to support normative comparisons and calculation of load reductions. The connected device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take

corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate.

The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes, and technology.

Administrative requirements- include internal and external staffing levels expressed on a full-time equivalent (FTE) basis

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. Please refer to Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

See Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$1.3M, which represents approximately 7 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

Please reference Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

For the FTM component of this program, FTM measures are limited to ten percent of the EE&C plan portfolio MWh and MW savings in accordance with the Commission's Implementation Order. While no energy savings, demand reductions or project funding were included in the projections, the Company intends to identify Company and project developer initiatives implemented during the course of Phase V supporting energy savings and system load relief. See Section 3.1.6 for additional information.

Estimated participation – include tables with key assumptions of estimated participation. See Table 9.

Please see Appendix B, Table 9.

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

Kindly refer to Appendix B, Table 10.

For the FTM component of this program, the program budget includes administrative, tracking and reporting and evaluation costs provided by the Company's EE&C staff and or its implementation CPSs

To timely and efficiently respond to market conditions and sustain program operations and momentum, support increased customer participation and benefits, and the Company's ability and efforts to achieve its goals, the Company reserves the right to reallocate up to 10% of the total Program budget between sectors and programs. The Company will include discussion and tables detailing any reallocation of program budgets as part of its semi-annual reports.

Estimated percentage of sector budget attributed to program

Please see Appendix B, Table 6, Appendix B, Tables 10 and 12.

Cost-effectiveness- include gross and net TRC and net-to-gross ("NTG") ratio for each program. For gross tables, net-to-gross ratio ("NTGR") should be "1.0." See Table 14, Gross and Net versions. (2025 IO at 217-221)

Details are set forth in Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. Please also see Appendix B, Table 7 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.

Other utility programs were not benchmarked for the purposes of EE&C program design or program participation assumptions. Please see Sections 1.2, 3.1, and 3.2 for information used to inform the program design and program participation assumptions.

Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved population

The Residential Energy Solutions program was designed to target customers living in all forms of housing - from renters to single family homeowners to multifamily dwellings. The program includes direct or targeted components that engages customers in each of the various housing segments, including residential, low-income and multifamily, and new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing customers with energy efficiency education as well as information regarding other program services and opportunities upon which they can act. For Phase V, the Company also plans to participate in community-based events and marketing activities to help program services reach historically

underserved populations and provide these customers among different housing and ownership types additional outreach, education and awareness regarding program opportunities for improving energy efficiency in their home.

In addition, to further drive participation and energy savings to all residential customers, the Company plans to collaborate, coordinate and work with other conservation programs to promote and leverage braided funding opportunities to residential customers installing qualifying energy efficiency projects. Programs such as IRA Home Efficiency Rebates (“IRA HER”) and the Home Electrification and Appliance Rebate (“IRA HEAR”) are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. The Company will collaborate with the DEP and other state-administered and third-party programs to promote and leverage these additional incentive opportunities to provide program services to eligible customers.

Other information deemed appropriate

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies’ Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. For the Phase V Plan, the Company is consolidating the former Energy Efficient Homes and Energy Efficient Products program, now called the Residential Energy Solutions program, to better support leveraging cross program promotions and offerings to customers and achieve additional participation and energy savings. In addition, the following summarizes other key changes to this program:

Products:

- Updated incentive amounts for recycling, appliance rebate, and other products
- Added recycling measures for Low Volume Refrigerators (Mini Fridge) and Coolers
- Projected anticipated code changes for Refrigerators, Freezers, Clothes Dryers and Heat Pump Water Heaters
- Added new measures for Linear LED Fixtures, Coolers, Clothes Washer/Dryer Combo, LED Nightlights and Holiday Lights
- Removed Water Coolers and Ceiling Fans
- Removed Consumer Electronics
- Added Agriculture measures (as extension of offering to Small C&I Customers)

HVAC and Solar Component

- Updated incentive amounts
- Removed Circulating Pumps, HVAC Quality Install, and Ductless Mini-Split A/C
- Added Window Heat Pumps, and Resistance Electric Heat to Heat Pump, Duct Minisplit Heat Pump, and PTHP measures

Behavioral

- No changes from Phase IV

Multifamily – Res

- Updated incentive amounts

New Homes - Res

- Updated incentive amounts

Comprehensive Audits

- Updated incentive amounts
- Added discrete measures for Solar PV, Heat Pumps, Central Air Conditioners and Heat Pump Water Heaters.
- Transitioned EE Kits and School Education to outreach and marketing.

Daily Load-Shifting and Peak Demand Reduction

- New Component offering

Front of Meter (FTM) Program

- New Component offering

3.2.1 Low-Income Sub-Sector (as defined by 66 Pa. C.S. § 2806.1) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs.

Program Name and Program years during which program will be implemented

Low-Income Energy Efficiency Program

Program years during which program will be implemented

June 2026 - May 2031

Objective(s)

The primary objectives of this program are to help low-income households improve their energy efficiency and control energy spending through a variety of program offerings that: (i) provide energy efficiency and conservation and energy usage education; (ii) promote adoption of energy saving behaviors; (iii) provide or install basic to comprehensive, prescriptive energy efficiency, and comprehensive whole home measures; (iv) encourage customers to turn in inefficient appliances, retrofit existing end-use equipment with more efficient ones, or implement new efficient end-use equipment; and (v) achieve the construction of energy efficient new low-income homes.

Target Market- including market size to help frame participation estimates (e.g., number of households, electric sales etc.).

The target market for this program is customers who are income-qualified up to 150% of the Federal Poverty Income Guideline (“FPIG”). The Company has approximately 1.8 million residential customers, of which a subset are income qualified up to 150% of the FPIG but are not fully known by the Company. The target market for the various program components among this subset of residential customers varies broadly based on multiple factors such as the customers’

historical energy usage, the saturation of eligible measures within these households, LIURP program participation or eligibility and others. As more fully addressed in Section 1.2, the Company developed participation projections in consideration of many factors (e.g. historical performance, input from its Consultant, implementation team and other stakeholders, etc.) which inherently incorporates the target market for each of the program components and measures. See Appendix B, Table 9 for a list of participation assumptions by measure.

If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports

Program description

The Low-Income Energy Efficiency Program is an umbrella program that includes multiple program components, delivery channels, and vendors to support broad customer engagement, education, and participation to achieve energy savings in low-income households. The program includes direct or targeted offerings that both engage customers by providing them with energy efficiency education as well as information regarding other available program services and opportunities. The program offerings incorporate strategies to change behaviors and provide prescriptive measures, direct install measures, and whole home/comprehensive solutions at no-cost as well as enhanced incentives for select measures that collectively address the initial cost barrier to achieve participation by low-income customers. The program also targets multifamily buildings and the construction of new energy efficient low-income housing. This program includes the following EE&C components:

Products:

- This component promotes the purchase and installation of select efficient residential products, and to turn in and recycle qualifying, inefficient, operating appliances, with enhanced incentives for income-qualified customers. Qualifying appliances for turn in and recycling will be picked up at the customer's residence or at drop-off locations and recycled in a compliance with the EPA's RAD program criteria.

HVAC:

- This component provides the opportunity to incentivize the installation of qualifying energy efficient space and water heating heat pump equipment in coordination with other state or federal conservation programs.

Braided Funding Audits:

- This component provides the opportunity to co-fund audits or technical studies as part of an incentive towards an overall project including installation of qualifying measures in coordination with other state or federal conservations programs in which audit services are provided (e.g., DEP's IRA programs) for participation.

Behavioral:

- The Behavioral program component educates income-qualified customers regarding their home energy usage and provides customized recommendations to help low-income households improve their energy efficiency and control energy spending. The CSP will use data analytics to identify and target participation among low-income customers and will provide customized Low-Income Home Energy Reports promoting low to no-cost recommendations, high bill usage alerts, TOU education and coaching and other program opportunities available to them. The reports will help customers to understand how their energy consumption compares to similarly sized and equipped homes; understand how their energy use changes over time and across seasons; and identify opportunities to reduce their energy use. This component also offers an online audit tool that similarly provides recommendations for home energy efficiency and conservation opportunities and additional program opportunities available to them. The online audit tool converts the customers' input of their energy usage characteristics into information the customers can understand and act upon, such as the cost of heating and cooling their homes, a usage comparison graph, and tips on how to save energy.

Multifamily:

- The Multifamily program component provides energy efficiency education to multifamily building owners and tenants through energy assessments that examine major end uses including appliances, lighting, and HVAC systems, including building systems and building shell, and provides recommendations for energy efficiency improvements. The program component provides direct installation of measures and financial incentives towards the installation of building and common area energy savings opportunities including prescriptive equipment replacement and custom retrofit projects, including but not limited to, insulation, air sealing, duct sealing, heat pumps, heat pump water heaters and appliances. Workshops providing energy education to tenants may also be conducted to target additional participation or energy savings opportunities.

New Homes:

- The New Homes program component provides incentives to builders of income-qualified housing for achieving energy efficiency savings and targets through a combination of building shell and appliance and equipment upgrades. To qualify for this program, the builder must construct the home to meet the energy efficiency requirements established by the ENERGY STAR program or to a higher efficiency level than the current adopted building code.

Weatherization:

- The Weatherization component includes WARM Plus, WARM Extra Measures, Low-Income Outreach & Assessment and LIURP Lookback, as follows:
 - Warm Plus, is an expansion of the existing comprehensive Low-Income Usage Reduction Program (LIURP), also known as the WARM program. The WARM Plus program serves additional homes with education, comprehensive weatherization services and HVAC, water heating and/or appliance replacements or other efficiency upgrades, including but not limited to, insulation, air sealing,

- duct sealing, heat pumps, residential heat pump water heaters and residential appliances and other products.
- WARM Extra Measures provides the installation of electric energy savings measures incremental to those provided to customers participating in LIURP or other conservation programs, including but not limited to, heat pumps, heat pump water heaters and appliances and other products.
 - Low-Income Outreach and Assessment leverages community outreach and engagement activities to help identify and recruit customers to participate in Act 129 and low-income programs. Customers will be encouraged to enroll in programs such as the FirstEnergy Pennsylvania Customer Assistance Program “PCAP” and to identify and promote participation in LIURP or other program opportunities. Welcome kits or other give aways may be provided to help engage, market, educate and promote customer participation, including promotional or educational materials and low-cost energy efficiency measures. Customers may also be offered a no-cost in-home energy assessment with direct installation of no/low-cost energy efficiency measures to help engage, market, educate and recruit increased customer participation in broader Act 129 and LIURP program services. This may also be offered to previous LIURP customers who usage has not changed or increased to provide education to help customers improve their energy efficiency.
 - LIURP Look Back targets customers who previously participated in LIURP programs, within the LIURP blackout period, for additional opportunities for energy savings to complement the prior LIURP retrofit projects. Potential opportunities include but are not limited to educational materials and installation of heat pump water heaters.

If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.

The Company considers the Residential Low-Income Energy Efficiency Program to be comprehensive. The program provides measures and/or combination of measures or projects, including whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions. More specifically, the program promotes and provides comprehensive measures to income-eligible customers including both an assortment of individual comprehensive measures as well as whole house treatments. The program also includes direct installation of comprehensive measures and whole home retrofits as well as incentives for efficient new home construction. The direct installation, home retrofit and new construction measures engages builders, developers, contractors, and program allies in providing comprehensive measures and projects across the low-income sector. Multiple measures included in this program have long-lasting expected useful lives and that result in deep savings are considered to be comprehensive, and include program measures such as HVAC equipment (e.g. heat pumps), appliances (e.g. heat pump water heaters), etc.. Several other program measures provide opportunities for whole home/comprehensive solutions such as direct installation, new construction and weatherization. Please see Appendix B, Table 8 for a list of measures that are identified as comprehensive.

Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.

With oversight from the Company, the CSP(s) hired by the Company to implement the Low-Income Energy Efficiency Program components, through ongoing educational, marketing and outreach activities, will coordinate and encourage participation in the other components of the program or other Act 129 programs where applicable. The program components will be cross-marketed, where practical, in conjunction with the other Low-Income Energy Efficiency Program component offerings to promote additional participation, savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers. For example, in the case of the Behavioral Component, the home energy reports will include marketing that targets and promotes additional program offerings. The Company will assess cross-participation by home energy report recipients in other residential energy efficiency programs through evaluation of the program and will leverage this information to encourage participation in other residential program offerings.

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars and training regarding eligibility, incentives, and other program details to help them promote and market program opportunities with customers. As part of these activities, time will be spent detailing the various program components as well as applicable other Act 129 programs that may provide additional savings and increased participation opportunities for the Company's customers, including income-qualified opportunities.

Implementation strategy (including expected changes that may occur in different program years)

The Company will oversee and administer the overall Phase V Plan and will contract with implementation CSP(s) who will directly administer and manage delivery of the program and provide program services. Implementation activities will include, where applicable, efforts to raise awareness, outreach, enrollment, and fulfillment of program delivery, validating customer eligibility, providing program services, processing incentives, and conducting outreach to and securing partnerships with trade allies to ensure customers are able to easily participate in the program. The implementation CSP(s) will be responsible for the ongoing implementation of the program component(s), including staffing, development and maintenance of website(s), promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. Specific implementation strategies associated with program components may also include but are not limited to the following:

- **Braided Funding:** The program includes the opportunity to collaborate and coordinate with other conservation programs for measures including but not limited to qualifying energy efficient space and water heating heat pump equipment. The program implementation CSP(s) will be required to collaborate and coordinate with other state or federal programs (e.g. IRA HEAR) and other utility programs or providers (e.g. Natural Gas Distribution Companies "NGDCs", Water Companies) and the corresponding program administrators to seek to leverage these braided funding opportunities to increase participation and energy savings under this program.

- Behavioral: The implementation CSP will conduct the energy usage analysis and develop and deliver customized Low-Income Home Energy Reports to income-qualified customers by mail and/or email. For the online audit, the Company plans to utilize its enterprise-wide Online Audit tool.
- Multifamily: The implementation CSP will engage trade allies and subcontractors, such as insulation, weatherization, heating, and cooling contractors who will be recruited to partner in this component in addition to BPI Certified auditors. The implementation CSP will utilize the trade allies' network and subcontractors to promote further comprehensive retrofits recommended under this program component. In addition, the implementation CSP for this program component will manage and coordinate implementation of both residential and commercial multifamily program components to avoid duplicating efforts for projects and will strive to coordinate with available and applicable national and state housing programs.
- New Homes: To identify potential projects, the Company will work with the Pennsylvania Housing Financing Agency (PHFA) or other entities. The implementation CSP will target and conduct outreach to home builders to inform them of the program offering, components, and benefits and to achieve program buy-in and their participation.
- Weatherization: The implementation CSP(s) will conduct community outreach and engagement activities to identify and promote income eligible customer participation in the program and other low-income programs. The CSP(s) will also recruit professional or BPI Certified subcontractors and/or trade allies to participate in the program, including CBOs and/or additional vendors, to perform customer and community outreach and engagement activities, energy audits and installation services. The Company will work with the CSP(s) to ensure efficient program referrals and/or leveraging contractors and coordination providing services with the Company's LIURP and PCAP programs, NGDCs or other providers, the Department of Community and Economic Development ("DCED") Weatherization Assistance Program, and/or other conservation programs.

The Company will strive to continue implementing and operating the program throughout the full duration of Phase V even if it meets its low-income carveout before the end of the phase. The Company will monitor program results and forecasts (*e.g.*, expenditures, participation, etc.) and will consider reallocation of funds from other programs. The Company will communicate with interested parties if it projects that program budgets will be depleted prior to the end of the phase and of any plans to reallocate funds from other programs.

As detailed above for Braided Funding, leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. The CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to relevant program components. The goal will be to collaborate and coordinate with other program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives,

federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in the delivery of the Act 129 programs. Please reference Section 4.4 for additional information.

Program issues and risks and risk management strategy

The risks associated with this program are primarily identifying income-qualified customers and getting enough customers to participate in some of the program components. Well-established and innovative outreach and marketing techniques will be used to help identify income-qualified customers and promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company's budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from certain end uses (e.g. Solar) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other low-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to this program include:

- **Customer Awareness and Engagement:** Low-income customers may not be fully aware of energy efficiency opportunities for their or home, and many customers, in general, are unaware of the “whole house” approach to energy-efficiency. The Company will work to address this by:
 - Targeted outreach and community engagement activities
 - Providing customers energy efficiency and energy usage education and specific tips and recommendations that promote energy efficiency and conservation opportunities and available program services;
 - Highlighting the training and BPI certification that contractors must have;
 - Identifying how the shell measure improvements can improve their comfort within the home;
 - Reinforcing that the installation of equipment and shell measures may increase the value of their home;
 - Collaborating and coordinating with Company's LIURP and PCAP programs, DCED Weatherization Assistance Program, NGDCs or other providers, and other conservation programs to raise awareness of Act 129 programs and services.
- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront cost but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for

efficient equipment. Low-income customers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, select measures are provided at no additional cost and enhanced incentives are provided on other select measures to reduce the initial cost to income-qualified customers.

- **Cost of Home Retrofits:** Low-income customers may not have the financial ability to invest in home retrofits. The Company addresses this barrier by providing direct install measures and whole home/comprehensive solutions at no-cost to promote and achieve participation by low-income customers.
- **Subcontractor and Trade Ally Awareness and Training:** To meet certain program component participation goals, sufficient auditors and contractors must be available to undertake the work. The Company will work with its implementation CSP(s) to address this barrier by trying to engage and recruit more qualified program allies and trade allies to participate in select program components.

Additionally, health and safety issues may restrict providing certain program services to customers. The Company will pursue Health and Safety remediation with other available programs and will work with their universal service program administrators to develop and maintain a list of available housing rehabilitation providers that the implementation CSP will provide to households when these issues cannot be remediated through the Company's programs. If other programs are not timely available or applicable, the Company will provide a portion of its Low-Income Weatherization program component budget for Health and Safety remediation.

The Company will seek to manage barriers to program success through a commitment to actively monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, and marketing/advertising, and improvement opportunities. The Company and/or the implementation CSPs will monitor participation and performance to assess, where applicable, the effectiveness of program services, outreach efforts, incentive levels, delivery methods, and both program ally and trade ally availability, so that they can provide suggestions on how to assure that the program is continually providing customers with their needs. Kindly refer to Section 4.1.2 for more information on potential risks and the Company's anticipated risk mitigation strategies.

Anticipated costs to participating customers

All program components except Product rebates and Multifamily, are provided at no additional cost to income-qualified customers. Customers and/or landlords will have to pay the balance of equipment and installation costs not covered by the rebate/incentives for the Products and Multifamily program components. Reference Appendix B, Table 7 for the incremental cost and incentive range for each measure in the program components.

Ramp up strategy

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program measures being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. Please reference the discussion in Section 1.4 and 4.1.5 for more details on ramp up.

Marketing strategy

Marketing and outreach activities will target income-eligible customers to inform them of the program. The marketing strategy will include, but is not limited to, marketing activities coordinated with other Act 129 programs, LIURP and other state low-income programs such as the PCAP, Department of Public Welfare, PHFA, DCED WAP, NGDC or other providers, state Inflation Reduction Act program administrators, and other conservation programs and CBO initiatives.

In general, the Company's implementation CSP(s) will develop and administer the marketing plan for each program component under management by the Company. Marketing activities will target income-eligible customers to inform them of the program, its components, and the associated benefits as needed to meet program goals through channels such as but not limited to Company's bill inserts, Company's website, direct mail campaigns, radio, newspaper and internet advertising, signs, posters, postcards, giveaways, and/or special promotional events, senior citizen and low-income information fairs and community presentations. The Behavioral component will also serve as a portal to educate the customer on other program opportunities available to them. In addition, certain program components will also implement cross marketing that will be used in conjunction with other low-income program components to promote additional participation.

The marketing strategy for the Multifamily low-income component will focus on informing property owners, managers, associations, tenant groups, municipalities, and community organizations about the availability and benefits of the program and how to participate. More specifically, the CSP will develop and disseminate clear information and program marketing materials to multifamily property managers regarding the measures, incentives, and cost sharing requirements that will be available to them to improve the energy efficiency of their properties. The Company will share this information and program marketing materials at its stakeholder meetings. For Phase V, the marketing strategy will also include collaboration with State IRA administrators focused on distribution of IRA funds to Multi-family low-income homes through the IRA HEAR and IRA HER programs and other conservation programs. By cross collaborative marketing, the Company will look to increase participation in Act 129 programs. The CSP for the Multifamily component will also market and promote comprehensive retrofits to customers, including the cost-saving benefits, information on typical payback time frames and direct installation measures and cost-share rebates to better prepare the customer for the decisions and financial investments associated with and to promote the customer completing comprehensive retrofit projects. In addition, each participant will be given applications and marketing materials

for other applicable program offerings at the time of the audit. The CSP will also attempt to follow up with participants, either through a telephone call or customer satisfaction survey to measure satisfaction with the component in general and with delivery personnel. The CSP will also identify customers who did not complete additional retrofit measures to provide additional guidance or to understand the barriers to completing comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program delivery.

The CSP for the New Homes program component will target home builders, HERS raters, and eligible customers to inform them of the program changes, the new measures, its components, and the associated benefits through education via discussions, newsletters, and e-mails to the building community, and the Company's website. The CSP will actively recruit participants through existing builder and rater partners, other utility programs, local HBAs, green building programs, and other allies who have established relationships within the residential construction community.

Key elements of the marketing strategy for the low-income program may include:

- Brochures that describe the benefits and features of the program, including application forms and processes. The brochures will be available for various public awareness events (community events, presentations, seminars etc.).
- Bill inserts, bill messages, email, direct mail, social media platforms, billboards, and pop-up stores.
- Company website content providing program information resources, contact information, online application forms, and links to other relevant services and information resources.
- Customer representatives trained to promote the program to their customers.
- Presence at conferences and public events used to increase general awareness of the program and distribute program promotional materials.
- Targeted outreach through direct mailings, energy efficiency kits and presentations to inform customers, builders, developers, property owners, property managers, apartment associations, tenant groups, municipalities and community organizations about the benefits of the low-income program offerings and participation processes.
- Printed collateral highlighting the benefits and features of the program components as well as the enrollment and participation processes.
- Website content providing program component information resources and contact information.
- In-person visits by program representatives to qualified customers.
- Energy assessments of properties may include the direct installation of standard energy savings measures to engage, educate, and promote participation by the customer, building owner, or facility manager in the other program component offerings, thereby targeting deeper savings.
- School or community-based engagement events, energy efficiency awareness programs, promotional initiatives, and energy efficiency measure giveaways.
- Increase focus on Company Act 129 program benefits through collaboration, coordination, and training of other income qualified service providers including but not

limited to Company's LIURP and PCAP programs, DCED Weatherization Assistance Program, NGDC programs or other providers, and other conservation programs.

**Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., \$ per measure, \$ per kWh or MW saved)
See Table 8**

Please refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

For health and safety remediation, if other programs are not timely available or applicable, the Company will provide up to 50% of the total weatherization measure cost, when the cost and energy savings attributable to the remediation meets program component acquisition cost based on available program funds. Additionally, the Company will target spending of at least \$600,000 per year of its program budget on Health and Safety remediation to remove impediments for the installation of air sealing, insulation, and heat pumps for low-income households, subject to available program funding.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the term of this Phase V Plan, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements. Section 6.6 includes a broader discussion on incorporating future changes to codes and standards.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications available from participating retailers, the program website or directly from participating contractors;
- Online rebate forms or instant rebates provided through a dedicated website; and
- Midstream incentives provided through participating distributors or retail outlets

For the Multifamily program component, the Company will provide an enhanced incentive of up to 80% in common areas and 100% in low-income tenant spaces of multifamily buildings. Individually metered tenant units in multifamily buildings will be eligible for the same incentives available through the residential or low-income programs, depending on whether the building meets the low-income occupant threshold. If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for the enhanced low-income incentives. Additionally, low-income housing programs that include housing types supported through local, state, or federal funds and have independent eligibility

guidelines will also be considered categorically eligible for enhanced low-income incentives through the Multifamily program component, as established by the Company's compliance filing with the Commission.

The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC

Most of the program measures are provided at no cost to income-qualified customers with the program paying the entire measure cost for participants. For the Products and Multifamily program components, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon customer response and market conditions over the Phase V Plan period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with program component performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultant, CSP, or stakeholder input, and industry benchmarking. Incentives will vary depending on factors, including, but not limited to, the specific program component, end-use and measure, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace.

Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be postmarked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all project measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

Key schedule milestones

As set forth in the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- November 26, 2025: Phase V Plan filed with the PA PUC
- December 12, 2025: RFP issued for program implementation CSP(s)
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program implementation begins

Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide EE&C Plan Evaluator (SWE)

The Company's CSP for EM&V services will be required to perform evaluation, measurement and verification of the program in accordance with the state's Evaluation Framework. Activities for this program may include activities such as but not limited to:

Products and HVAC:

- Verify that qualified equipment and products have been sold by participating retailers, contractors, distributors, or manufacturers seeking payment of incentives by auditing a sample of their claims.
- Verify that new, more efficient products have been installed through review of documentation provided by participating retailers, contractors, distributors, third party administrators (e.g., IRA HEAR plan administrators), or manufacturers, as well as individual participant rebate applications.
- For appliance recycling measures, verify that the planned number of targeted appliances are collected and properly recycled and that the calculations of kWh and kW savings from appliance retirement are accurate and compliant with applicable requirements including those contained in the TRM.

Behavioral:

- Program impacts will be measured through billing analysis with a randomized control trial approach in accordance to the PA Evaluation Framework. The EM&V Contractor will perform participation uplift adjustments and avoided decay calculations in accordance with the PA TRM.

Multifamily and Weatherization:

- Verify that the planned number of each type of audit is performed on time and within budget. A sample of audits will be reviewed to check that their actual costs do not exceed the contract cost, and that customers are satisfied with the service.
- Conduct surveys and check sample calculations of projected savings for accuracy and for compliance with the PA TRM guidelines.
- Verify that existing EE&C opportunities are properly quantified to enable accurate tracking and documentation of energy efficiency and demand reduction.
- For installed measures and retrofit projects, verify that the installed measures and comprehensive diagnostics are performed as supported on program applications.

New Homes:

- Select a representative sample of homes for comprehensive measurement and verification, including reviewing both the baseline and as-built home properties as documented in a RESNET accredited building simulation program.
- Verify the models and their associated impacts for sampled homes through on-site data collection: Gather as-built data through independent on-site visits and review of data gathered during quality assurance / quality control visits.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that energy savings and demand reduction are being realized as projected. A tracking and reporting system will be used for such monitoring. If EE&C program indicators show that

projected EE&C targets are not likely to be achieved on schedule or within budget, the Company will take appropriate corrective actions such as changing marketing and/or incentive levels.

The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes, and technology.

Administrative requirements- include internal and external staffing levels expressed on a full-time equivalent (FTE) basis

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. Reference Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

Please refer to Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$0.4M, which represents approximately 2 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

See Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

Estimated participation – include tables with key assumptions of estimated participation. See Table 9.

These details are set forth in Appendix B, Table 9.

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

See Appendix B, Table 9 and 10.

Estimated percentage of sector budget attributed to program

Please refer to Appendix B, Table 6, Appendix B, Table 10 and 12.

Cost-effectiveness- include gross and net TRC and NTGR for each program. For gross tables, NTGR should be “1.0.” See Table 14, Gross and Net versions. (2025 IO at 217-221)

See Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. See Appendix B, Table 8 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.

Other utility programs were not benchmarked for the purposes of program design or program participation assumptions.

Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations

Residential Low Income program components were designed to target customers living in all forms of housing - from renters to single family homeowners to multifamily dwellings. The residential programs include direct or targeted programs that engage customers across all housing segments, including residential, low-income and multifamily, as well as new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing customers with energy efficiency education as well as information regarding other program services and opportunities upon which they can act. Additionally, the Company plans to participate in community-based events and other marketing initiatives to conduct outreach and engage customers to provide education and promotional opportunities aimed at identifying and reaching additional customers and achieving participation in the program components across all house types by income-eligible customers.

The Residential Low-Income program has been designed to promote the participation of all income qualified residential customers. The program includes direct or targeted offerings that both engage customers by providing them with energy efficiency education as well as information regarding other available program services and opportunities. The program offerings incorporate strategies to change behaviors and provide prescriptive measures, direct install measures, and whole home/comprehensive solutions at no-cost as well as enhanced incentives for select measures that collectively address the initial cost barrier to achieve participation. The program also targets multifamily buildings and the construction of new energy efficient low-income housing.

For Phase V, to further drive participation and energy savings by all low-income customers, the Company plans to collaborate and pursue coordination with other conservation programs to target and provide additional braided funding opportunities to low income customers installing qualified energy efficiency projects. Programs such as IRA HER and the IRA HEAR are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. The Company plans to work with the DEP and other state administered and third-party conservation programs to pursue providing customers with these and additional incentive opportunities that are available to help low-income households improve their energy efficiency and control energy spending. See Section 4.4 for more information on Coordination with Other State Conservation Programs.

Other information deemed appropriate

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. The following summarizes key changes to this program for Phase V:

Products:

- Updated incentive amounts for recycling, appliance rebates and other products
- Added recycling measures for Low Volume Refrigerators (Mini Fridge) and Coolers
- Added new measures for Linear LED Fixtures, Coolers, Clothes Washer/Dryer Combo, LED Nightlights and Holiday Lights
- Removed measures for Water Coolers and Variable Speed Pool Pumps

HVAC:

- Added new program component and measures for IRA HEAR Program Measures
 - Heat Pump
 - Heat Pump Water Heater

Braided Funding Audit:

- Added new program component and measure for co-funding audits
 - Example – ASHRAE Level 2 audits to support IRA HER Program

Weatherization:

- Added new measure for Customer Engagement including community outreach, in home assessments and/or welcome kits/giveaways
- Added new measure for LIURP Look Back

EE Kits:

- Removed program component and measure, may be provided for marketing and outreach

School Education:

- Removed program component and measure, may be provided for marketing and outreach

○ ***Details on how the plan will meet the proportionate number of measures requirement.***

The Commission requires that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG in proportion to that sector's share of the total energy usage in the EDC's service territory. The Phase V Implementation Order (at 54 and 55) specifies 9.3% as FirstEnergy's proportionate number of measures equivalent to the low-income sector's share of usage. As discussed in more detail in Section 9.1.3, the Phase V Plan includes a total of 183 measures and 48 measures that are provided directly or targeted to Low-

Income customers which represents 26% of the total, significantly greater than the target percentage.

- ***Confirmation that all low-income compliance savings will come from specific low-income programs or low-income verified participants in multifamily housing programs.***

Confirmed. The Phase V Plan includes a comprehensive suite of program components within the Low-Income Program that are specific for the low-income sector and are collectively designed to achieve the consumption reduction requirements.

- ***Include estimates of any applicable low-income carryover savings from Phase IV. Carryover savings from Phase IV may not exceed 20% of the Phase V low-income compliance target.***

Consistent with the FIO at page 85, this plan is designed to meet the required savings targets without Phase IV carryover. As of the Company's most recent Annual Report²⁰, the Company has no applicable low-income carryover savings from Phase IV.

3.3 *Small C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net)*

The table below summarizes the Small C&I program included in the Phase V Plan, along with a detailed description:

²⁰ ACT 129 Phase IV Semi & Annual Reports - PA PY16 Annual Report

FE PA Table 5: New Small C/I Programs

FE PA Table 5: Small C/I Programs & Descriptions	
Proposed Phase V Program	Program Description
Small Commercial & Industrial Programs	
C&I Energy Solutions Program - Small	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.

Below is further information for the Commercial/Industrial Small sector included in the Phase V Plan:

Program Name and Program years during which program will be implemented

C&I Energy Solutions Program – Small

Program years during which program will be implemented

June 2026 - May 2031

Objective(s)

A primary objective of this program is to provide a solution for smaller commercial and industrial customers, including GNI customers, who are “harder to reach” and/or are interested in becoming more energy efficient. Smaller business customers may have more barriers to participation because they lack the technical expertise, time, or capital to research and apply for incentives or implement EE&C measures offered under traditional prescriptive or custom program offerings. The program overcomes these barriers by providing customer engagement with educational and efficiency measures in addition to prescriptive, calculated, or performance-based incentives or midstream or upstream incentives or buydowns and providing support to manufacturers, distributors, contractors, and retailers that sell energy efficient products. Another objective of the program is to promote the installation of energy efficient equipment and to increase the efficiency of processes, buildings, building operations, and systems among small business customers.

This program includes a FTM component. The primary objective of the FTM component of this program is to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and can help mitigate growing resource adequacy concerns in the State.

This program also includes a DLS and PDR component. The objective of the DLS and PDR program component is to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. This component includes a combination of event based and daily load shifting strategies including but not limited to connected device load shifting and custom demand response tailored to customer opportunities.

Target market – including market size to help frame participation estimates (e.g. number of households, electric sales etc.).

For the EE&C Program Components, the target market generally includes all small commercial and industrial customers, including GNI customers, of the Company that have program eligible applications or meet other program prerequisites. More specifically, the Company has approximately 260,000 small commercial and industrial customers, and the target market for this program ranges from the Prescriptive component which typically applies to a large percentage or broad range of the customer population to the Energy Management component that promotes eligible measures tailored to the customer's business type or industry, which will generally apply to a small subset of the overall customer base.

For the DLS and PDR Component, the target market includes all small commercial and industrial customers of the Company in the Company's service territories with qualifying connected devices or customers with custom DLS and PDR opportunities during daily summer and winter peak hours.

The Company developed participation projections in consideration of many factors (e.g., historical performance, input from its Consultant, implementation team and other stakeholders, etc.) as discussed in section 1.2, which inherently incorporates the target market for each program's components and measures. Please see Appendix B, Table 9 for a list of participation assumptions by measure.

If the program is an umbrella program list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports

Program Description

The C&I Energy Solutions – Small Program is an umbrella program that engages small C&I customers through multiple program components to provide energy efficiency and energy usage education and awareness. The program is designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels and provide financial support through prescriptive or performance-based incentives to the small commercial and industrial

customers, including GNI customers, who implement qualifying high efficiency equipment, retrofit specialized processes and applications to higher efficiency processes and applications, retro-commissioning, or high efficiency building shell or system improvements. Prescriptive and performance incentives are intended to reduce the customer's capital investment for qualifying high efficiency equipment, processes, and systems. The SCI Program includes the Multifamily, Prescriptive, Custom, Energy Management, FTM and DLS and PDR program components, and are described as follows:

Multifamily: The Multifamily program component provides customer engagement with energy efficiency education through energy assessments and the installation of standard energy savings measures and provides or promotes energy savings opportunities including prescriptive equipment replacement and custom retrofit projects, in both common areas and tenant spaces. In addition, the Multifamily component will target low-income/affordable housing properties with enhanced incentives and measures. Customers will begin participation in the Multifamily component with an energy assessment and installation of standard energy savings measures. The assessment will identify and recommend additional energy savings opportunities that are specific to each customer and building and could include incentives for prescriptive equipment replacement or custom retrofit opportunities.

Prescriptive and Custom: The Prescriptive and Custom program components will promote the installation of high-efficiency equipment by the Company's small commercial and industrial customers, including GNI customers, either via the installation of prescriptive or custom measures or projects. The Prescriptive program component provides prescriptive-based incentives to small businesses, including GNI, customers to purchase and install energy efficient equipment and appliances. This program component also provides prescriptive-based incentives to small commercial and industrial customers, including GNI customers, to purchase and install energy efficient equipment that are residential type appliances that reside within a small commercial and industrial customer's facility (e.g., break rooms, small kitchens, etc.) as well as the removal and recycling of qualifying inefficient, operating appliances. (Periodic events may be offered at centralized drop-off locations where customers can drop off smaller qualified inefficient operating appliances such as, but not limited to, dehumidifiers and room air conditioners.)

Prescriptive incentives will be offered for individual applications and retrofit projects employing standard efficient technologies where the anticipated energy savings are relatively consistent. These measures will incentivize energy efficient lighting, heating, and cooling equipment, agricultural and food service equipment, and residential grade appliances among other efficiency measures. The Prescriptive program component will support and/or provide downstream approaches and may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors, and retailers that sell select energy efficient products. Type and value of incentive provided will vary and will include electric technologies that improve energy efficiency. Up-front rebates will be offered to reduce first-cost barriers.

Prescriptive measures are designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels. Prescriptive rebates are designed to: Provide incentives to facility owners and operators for the installation of high efficiency equipment, and

controls. Promote the marketing of high efficiency measures by trade allies such as electrical contractors, mechanical contractors, and their distributors to increase market demand. Ensure that the participation process is clear and simple. Prescriptive incentives will increase adoption of energy efficient equipment by harnessing the Company's unique customer relationships to positively impact the sales process surrounding efficient equipment, from education and awareness with customers to engagement with trade ally contractors and equipment distributors for the high efficiency equipment.

The Custom program component includes custom measures that promote electric efficiency opportunities for small commercial and industrial customers, including GNI customers, that are non-standard and not captured by prescriptive equipment. Calculated or performance-based incentives will be provided to customers for upgrading less efficient specialized processes and applications (e.g., variable frequency drives, motors, compressed air, equipment replacement, CHP, solar photovoltaic (solar PV), industrial process changes, data centers, etc.) to high efficiency specialized processes and applications. This program component also provides incentives for customers to install specialized building shell or improvements for new construction or renovation projects. Calculated or performance-based incentives are designed to reduce the customer's capital investment for qualifying energy efficient measures.

Typical custom measures that are eligible for incentives are either less common measures or efficient opportunities in specialized applications that may include manufacturing or industry-specific processes, or non-traditional use cases. In many cases, custom efficiency projects are more complex than prescriptive equipment replacement.

Potential participants in both the Prescriptive and Custom program components are recommended to submit an application for pre-approval to confirm project eligibility and reserve funding. The Company and/or their CSP will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program component requirements, terms and conditions, and general information. In addition, the Company and/or its CSP will provide applications in web ready formats to ensure participants have easy access to the forms. The pre-approval process provides for the review of the customer's proposed project to confirm measure eligibility and incentive budget availability. This also supports the Company's program and program component management because it communicates projects that are in the pipeline. If accepted and pre-approved by the Company, a timeline is established for project completion to qualify for a rebate. The typical lead time for completing a project is 90 to 120 days but can be longer depending on the complexity of the project. Large projects, or subsets of projects, may be required to undergo pre-and post-inspection to validate project energy savings.

Energy Management: The Energy Management program component targets energy savings for existing small commercial and industrial facilities by providing a holistic approach to improving building energy performance through the maintenance, retrofit, tune-up, and retro-commissioning services for existing buildings and through the implementation of energy savings strategies that improve the overall operation and energy performance of buildings and building systems. This program component complements the Prescriptive and Custom components, which focus on capital equipment replacement or process improvement investments by improving the energy

performance of a building by maintaining, retrofitting, adjusting, and optimizing the systems within the building and the implementation of complementary energy savings measures. The program component also provides paths to track the ongoing building energy performance by using retro-commissioning, which ensures continued energy performance. By implementing these measures, customers also receive ancillary benefits, including improved occupant comfort, lower maintenance costs, and extended equipment life.

This program's subcomponents include strategies or implementation efforts that focus on specific energy efficiency measures and management practices that can be categorized as follows:

- Building Tune-Up: Provides a path for customers to implement a Building Tune-Up that will focus on implementation of measures that improve energy performance and savings in commercial and industrial facilities. Services focus on maintenance, calibration and adjustments to building systems and controls, diagnostic testing and installation of other measures that enhance overall building energy efficiency. The following Building Tune-Up program measures include, but are not limited to:
 - HVAC Tune-Up, including Refrigeration charge correction (if needed), cleaning evaporator and condenser coils, filter changes, verification of proper operation of fans and motors, and minor repairs to refrigerant lines and coils.
 - Calibration of building systems and controls, including energy management systems, lighting, and HVAC.
 - Diagnostic and function tests of applicable major systems and equipment.
 - Comprehensive application/installation of equipment or building measures such as:
 - HVAC controls to optimize Roof Top Units ("RTU")/Air Handling Units ("AHU").
 - Refrigeration controls to optimize refrigeration equipment.
 - Lighting upgrades, including the application of lighting controls and optimization of installations.
 - Chiller system controls to optimize chiller performance.
 - Building shell and weatherization measures
 - Electrification measures
 - Other program eligible energy saving measures identified through a building assessment (e.g. HVAC, refrigeration, food-service equipment, appliance replacement/recycling, EMS/BAS) .
 - Building Operations Training for qualified personnel to obtain Building Operations Certification ("BOC") through a certified training program or other training programs related to the efficient design, operations, and maintenance of buildings.
- Retro-Commissioning ("RCx"): Provides a comprehensive assessment of a customer's commercial/industrial building by using a prescribed planning process that includes a building audit, development of an action plan for the building, and development of a Measurement and Verification ("M&V") plan to ensure the optimum on-going

performance of the building and building systems. A comprehensive assessment of a commercial/industrial building using a prescribed planning and implementation process, including:

- Audit Phase – Customer confirms intent to participate in program and registers with the Company or the third-party implementation contractor. Customer and/or the customer’s consultant completes the required level of an American Society of Heating, Refrigerating, and Air Conditioning Engineers (“ASHRAE”) audit based on the complexity of the facility and develops a retro-commissioning implementation plan, including project timelines and plan to implement audit identified operation and maintenance measures. There may be opportunities to complete this Phase without a full ASHRAE level audit.
- Setup Phase – Contracted services to implement the plan are verified, long-term monitoring and reporting is developed and initiated, and project plan is implemented by customer.
- M&V Phase – Savings verification and rebate payment from implementation of the plan are completed.

Typical Retro-Commissioning program measures include but are not limited to:

- Optimizing chiller and boiler operations to better match building load conditions, reducing ventilation in over-ventilated areas.
- Fixing ventilation dampers that are open when they should be closed or vice versa.
- Decreasing supply air pressure setpoint and system rebalancing.
- Align zone temperature setpoints to match the building’s actual operating schedule.

Monitoring-Based Commissioning (“MBCx”): Monitoring-Based Commissioning (“MBCx”) offers monitoring software paired with a building’s energy management system to identify energy savings opportunities and optimize building performance and EE. Contracted services will alert the customer when equipment is not operating as expected using fault parameters and will work with the customer to correct ongoing issues and make improvements wherever possible. Planning and implementation typically include, but is not limited to:

- Assessment and qualification of a building energy management system. Assess utility bills and facility to recognize potential for energy savings.
- Customer agrees to have contracted services utilize eligible software with diagnostics and other functionality through a monitoring service contract.
- MBCx is designed to:
 - Maximize potential incentives with a deeper dive into a building’s overall performance
 - Monitor and identify cost savings opportunities
 - Benefit from a continuous process to improve comfort and optimize energy usage

- Maximize the operational efficiency of buildings

Virtual Commissioning (“VCx”): As an alternative to performing an on-site audit to develop a retro-commissioning plan, or as an additional complementary measure, VCx provides eligible customers with an analysis of their building’s energy performance. This analysis uses meter usage/other data and building modeling to identify and recommend energy efficiency measures and operational changes to improve a building’s overall energy performance. The process starts with benchmarking, peer comparison metrics (aids in determining energy performance to identify facilities that are underperforming) and then moves to site facility assessments; site facility assessments may be 100% virtual or may include on site work depending on customer needs and identified measures. The analysis will foster participation in the Company’s other programs by identifying and encouraging customers to implement other energy efficiency improvements. This offering can also use continuous engagement, monitoring, and periodic reviews of the customer’s energy usage to ensure that implemented measures or changes have been successfully completed. The use of building analysis using remote analysis techniques will also help hard to reach small business customers to participate in the programs because of limited or constrained access to customers’ facilities.

- Strategic Energy Management (SEM) / Virtual SEM - Strategic Energy Management (“SEM”) subcomponent is designed to optimize energy consumption for small C&I customers through long term management of existing systems and processes (including behavior), as well as tracking and benchmarking performance to identify and evaluate energy optimization efforts. Long term SEM efforts are typically focused on developing and executing an energy management strategy. This strategy is formulated through a series of site and/or remote visits and interviews with building owners and staff to specifically develop a Strategic Energy Management Plan (“SEMP”) for the customer’s facility. The SEMP will be reviewed with the customer by the Company and/or its CSP on a scheduled basis. This plan may include:
 - Revisions or improvements to an existing Building Automation System (“BAS”) or the addition and initiation of the use of a BAS to monitor and control the buildings components and systems. The implementation or improvements to a BAS or the review of an existing BAS, can include the proper training for building operators to achieve maximum efficiency.
 - Development of a maintenance plan for existing building mechanical/electrical equipment and or systems to identify best practices in building performance and an interactive monitoring of system components by both staff and sponsoring utilities.
 - Ongoing engagement to track energy usage and performance, assist with planning energy efficiency projects, and interact with facility personnel to adopt energy efficiency strategies and behaviors.
 - Utilizing other Program components/subcomponents, including: Prescriptive/Custom measures, Building Tune-Up, RCx, and VCx.

- Using building modeling and benchmarking to compare customer's usage and performance to cohort of similar facilities and VCx to track energy usage and performance over time.
- Application of whole building energy modeling tools that can model buildings for both operational and capital improvements.
- Scheduling of attendance of customer personnel to attend educational workshops, webinars, and group/individual training sessions with cohorts of facility managers (e.g., Building Operations Training)
- Recommendation/Coordination for additional funding sources and financing options
- Building Operations Training Provides incentives and/or training for qualified personnel, contractors, consultants, and customer building operation personnel, to participate in nationally recognized training and workforce development, which may include O&M training and certification programs related to the efficient design, operations, and maintenance of buildings, such as BOC through a certified training program.

Customers can participate by application to the program or may be contacted directly by program personnel. Customers can participate individually or in a cohort with other customers in the same industry. The cohort would allow customers to share best practices amongst each other as each customer goes through the SEM program lifecycle. A customer would still be treated as an individual with a unique project within the cohort. The program will retrieve customer demographics and obtain customer agreement for the services to be provided and facilitate ongoing customer engagement. The Company's CSP will develop application forms for this program that will guide applicants through eligibility guidelines, terms and conditions, and general program information requirements. In addition, the program will provide applications in web-ready formats to ensure participants and potential customers have easy access to the forms.

Supplemental program services include providing additional customer engagement, advisory, energy analysis and technical consulting services to help identify, promote, develop and implement projects under this program component, including but not limited to:

- Perform a Level 1 or 2 ASHRAE Audit of commercial or industrial facility or complete an engineering study that evaluates alternatives for the design of a system or process for a commercial building or industrial facility.
- Benchmarking of customer buildings and facilities
- Tracking customer EE&C metrics e.g. Lifetime/Lifecycle energy savings, Peak Demand savings

Front-Of-The-Meter ("FTM"): Through implementation of upgraded designs, equipment and operation of the Company's energy delivery system, the FTM component will deliver system energy savings and peak load reductions. Company and project developer initiatives supporting such system load relief include but are not limited to the Company's LTIP, its O&M plans, and other Company or project developer initiatives. Under the FTM program component, the

Company will coordinate with these FTM initiatives and operations to target energy savings and peak load reductions from the corresponding improvements.

Potential improvements that can provide energy savings and peak load reductions include but are not limited to: replacement of and upgrades to energy delivery equipment, voltage optimization (e.g., Conservation Voltage Reduction (“CVR”)), efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar PV projects that are not associated with an existing retail meter.

Daily Load Shifting (“DLS”) and Peak Demand Reduction (“PDR”): The C&I DLS and PDR program component is comprised of two program subcomponents - Connected Devices and Custom. Each subcomponent is designed to deliver load reductions on a daily and/or peak day event basis.

- Connected Devices: Participating C&I customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods. This subcomponent includes customers’ smart thermostats for control of heating, ventilation and air conditioning equipment, managed charging of electric vehicles, and battery storage or other potential customer equipment to reduce load of connected devices during peak load periods. This subcomponent will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance.
- Custom: The Custom subcomponent targets Commercial and Industrial customers to reduce load during peak load hours on a daily, scheduled, or event basis during the PA Act 129 summer and winter peak load periods through behavioral messaging, operations or process changes, equipment adjustments, controls or other specialized approaches adopted by the customer.

If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.

The Commercial and Industrial Programs were designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all customers. Commercial businesses and industrial customers are also addressed through programs that provide opportunities including prescriptive rebates, custom measures, building tune-up, and whole building/comprehensive solutions. The programs include specific opportunities that ensure access for small commercial and industrial customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. And the programs include opportunities that encourage customers to consider a holistic approach to Energy Efficiency for customers who are interested and able to participate in whole building/comprehensive solutions.

Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.

With oversight from the Company, the CSP(s) hired by the Company to implement the Energy Solutions program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and other Act 129 programs where applicable. The program components will be marketed, where practical, in conjunction with the other Energy Solutions Program offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers.

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers. As part of these activities, time will be spent detailing the various program components as well as applicable to other Act 129 programs to the various participating program allies, contractors and customers.

Implementation Strategy (including expected changes that may occur in different program years)

The Company will outsource the implementation of this program to CSP(s) who will be responsible to administer, promote, and provide the program to customers, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP(s) will be responsible for administration, marketing, outreach, fulfilling program services, application processing and documentation regarding purchased products and completed projects, and processing incentives and rebates, where applicable. The Company will review the application processes with its Phase V CSP(s) to identify and make improvements, as warranted, and will require the program CSP(s) to consider innovative outreach activities to engage customers, program allies, and trade allies throughout the implementation of the program.

The Company will perform overall administration and oversight of the program. The Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026.

Program information and links to program applications will be made available at the Company's program website. Completed applications to the program components will be processed online or returned via email, where applicable. For Phase V, pre-approved projects that are not completed prior to the conclusion of Phase IV, will be processed as part of the same Phase V program without re-application, consistent with the Company's review and eligibility requirements. The Company will consider other methods for providing rebates and other rebate application processes based on market considerations and opportunities that are identified during program implementation.

The Prescriptive and Custom program components will offer an on-line application portal for customers to submit rebates for energy efficient products or projects and may also develop a midstream approach, work with retailers, contractors, distributors, and/or manufacturers for midstream or upstream incentives or point of purchase buydowns for select measures. The CSP(s) will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program requirements, terms and conditions, and general information. In addition, the CSP(s) will provide applications in web ready formats to ensure participants have easy access to the forms. Additionally, the CSP(s) will provide support and assistance to retailers or distributors to support identification and promotion of qualifying energy efficient products. The CSP(s) will also provide technical support to customers on the application of energy efficiency measures and technologies included in these program components.

Additionally, for a number of appliances that will be offered incentives through the Company's prescriptive component, the Company expects federal standard changes to happen mid cycle and therefore will impact savings in a downward manner once these changes take place. The Company will work with its evaluator and the SWE to determine specific adoption of timing and savings impacts for the change.

The CSP for the Multifamily program component will provide targeted marketing to both multifamily customers and program allies to ensure awareness of the program and enhance customer participation. The CSP may also contract with qualified auditor(s) to provide the component services to customers, who will conduct marketing and the direct installation and retrofit aspects of this program component.

The CSP for the Energy Management program component will conduct the implementation aspects of this component to customers. Marketing will target specific customer types and program allies to ensure awareness of the component and its subcomponents and enhance customer participation. Additional targeted marketing will be completed to promote this program component and enhance participation among hard-to-reach small business customers. The CSP will also conduct the services provided through this program component and its subcomponents.

Customers can participate in the Multifamily and Energy Management program components by submitting an application or will be contacted directly by the CSP and/or auditors. The CSP will retrieve customer demographics and obtain customer agreement for the services to be provided and handle on-going customer engagement. Incentives for efficiency measures implemented will be issued after the measures are purchased or completed and required documentation is submitted.

For the FTM program component, the Company will coordinate with its engineering, operations and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.

For the DLS and PDR program component, the Company plans to contract with experienced CSP(s) to implement the various subcomponents supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program. The Company will perform overall administration and oversight of the

program. For the Custom subcomponent of DLS and PDR, the Company may also contract with customers directly or with PJM Curtailment Service Providers (“PJM CSPs”). Further, the Company anticipates adjusting implementation of the various subcomponents throughout the term of Phase V to improve performance based on actual results. Such changes may include but are not limited to adjusting enrollments, marketing, customer engagement, program approaches or terms and incentives.

Leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. To promote and leverage these programs and braided funding from multiple sources to customers as they are available and applicable to relevant program components, the CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns. The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. See Section 4.4 for additional information.

With regards to Alternative Energy Portfolio Standards (“AEPS”), the Company plans to promote the availability and support registrations for C&I participants of its Act 129 programs with eligible energy efficiency projects. The Company plans to collaborate and coordinate with the PA DEP and its AEPS program administrator to promote and facilitate the registrations. See Section 4.4.3 for more information.

Program issues and risks and risk management strategy

The risks associated with this program are primarily obtaining sufficient customers to participate in the various program components. Well-established and innovative outreach and marketing techniques will be used to promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company’s budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from several end uses (e.g. Solar, C&I Lighting and CHP) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other low-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to the program components include:

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Conversely, the business or economic climate may require customer incremental costs or contributions to be reduced in order to encourage participation. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels including midstream and downstream.
- **Customer Awareness and Engagement:** Smaller businesses and GNI customers may have limited resources and time to consider, pursue, or prioritize energy efficiency and may have efficiency needs not well aligned with traditional EE&C programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation. In addition to limited resources and time, other small customers may not be aware of the benefits of installing efficient equipment or completing other energy efficiency improvements. To address awareness and educational barriers, the Company will educate small customers on the program opportunities and the benefits of installing efficient equipment or completing other efficiency improvement through targeted marketing and outreach, providing program services, ensuring that incentives are easily accessible, and encouraging market transformation and stocking of efficient equipment through midstream incentives. The Company will also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of the program opportunities and available incentives.
- **Business/Operational Constraints:** Facilities often have unique operational constraints that act as a barrier to implement energy-efficiency projects and the maintenance of equipment. This barrier will be addressed by ensuring the program component operates cooperatively with participants, provides technical assistance and support, provides maintenance services, and offers timely incentives.
- **Sufficient Stocking and Availability of Efficient Products:** To support a robust marketplace for efficient equipment, the Company may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of and/or for marking down the cost of the efficient equipment at the point of sale.
- **Daily Load Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty of customer participation and program component performance with daily load shifting and demand response during summer and

winter demand peak periods. More specifically, it is unknown how customers and the program components will perform in daily load shifting across over 400 hours per year and in the winter period, both of which are new to PA and across the industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across the 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

Further risks include the measurement and verification of the peak load reduction impacts given new methodologies and protocols for daily load shifting. The CSP(s) for the program subcomponents will be required to monitor progress for participation and impacts, and to provide contingency associated with customer non-response or opt-outs. The CSP will also be required to provide reporting to the Company detailing its performance and to promptly react to any deficiencies.

The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, marketing/advertising, and improvement opportunities. The Company and/or the implementation CSPs will monitor participation and performance to assess, where applicable, the effectiveness of program services, outreach efforts, incentive levels, delivery methods, and feedback from both program and trade allies, so that they can provide suggestions on how to assure that the program is continually providing customers with their needs. See Section 4.1.2 for more information on potential risks and the Company's anticipated risk mitigation strategies.

Anticipated costs to participating customers

Customers will have to pay the balance of the energy efficient product, project and/or installation cost not covered by the rebate. See Appendix B, Table 8 for the incremental cost and incentive range for each measure in this program.

Note: There are no costs to customers for FTM EE&C measures included in this program. For Load Shifting and Peak Demand Reduction program component, there are no known anticipated costs for customers to participate. This program component primarily targets behavioral or operational changes and utilization of existing customer equipment for participation.

Ramp up strategy

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program components being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will

take approximately three- to six-months to fully start-up new or expanded program measures after program approval. See discussion in Section 1.4 and 4.1.5 for more details on ramp up.

For the DLS and PDR program component, since demand response programs were not offered in Phase IV and daily load shifting and winter demand response are new concepts for Act 129, it is anticipated that it will take four to six-months to start-and ramp up the DR program offerings. Because of this ramp up period, the Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026. This supports the CSP obtaining customer enrollments such that the Load Shifting and Peak Demand Reduction program component can begin implementation June 1, 2026. See discussion in Section 1.4 for more details on ramp up.

Marketing strategy

EE&C Program Components:

The Company will implement an aggressive, sector-based marketing campaign for the duration of the new Plan. Marketing will be used to target specific customer sectors to ensure awareness of the program components and enhance participation.

Marketing activities of the Prescriptive, Custom, and Energy Management program components will target eligible customers and program allies to inform them of the program, its components, and the associated benefits through direct mail, website, trade shows, the business customer newsletter, and key account managers. The Company will also work with distributors and contractors to market eligible higher efficiency equipment than required by federal standards.

Additionally, the expanding list of program allies will continue to be cultivated, as they are vital to the growth in customer participation. The Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers.

The CSP(s) for the Prescriptive, Custom, and Energy Management program components will target various market sectors (i.e., education, medical/health care, manufacturing, retail, food service) to enhance participation and promote a cross-section of measures applicable to each market. The Energy Management component will also outreach to building maintenance and operations personnel to promote the program component including the Building Tune-Up, Retro-commissioning, and Strategic Energy Management measures to enhance the energy performance of their facilities.

Since prescriptive retrofits are generally one-for-one replacements, measure-specific marketing will be developed for new measures or enhanced for continuing measures. These will be delivered to sectors most likely to utilize specific technology. Fact sheets, mailings, post cards, e-blasts, and on-location seminars will all be used to promote specific measures. Custom

marketing efforts require a consistent and directed outreach to program allies, the Company's managed accounts and government accounts whose processes are compatible with the Custom program component requirements. The CSP(s) will be required to develop and implement a diligent direct and indirect marketing plan to identify and target customers to connect them to appropriate measures using e-blasts, webinars, on-site seminars, and large customer newsletters, among other marketing and outreach initiatives. Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the program component where applicable.

The CSP(s) will identify and describe participation pathways for industry-specific customer segments, including, at a minimum, agriculture and data center customers, where such pathways are cost-effective and consistent with Act 129 requirements and the Company's Plan. Further, in order to attract multiple measure participation, the CSP will outreach via sectors (e.g., medical facilities for lighting, HVAC, custom processes, and CHP), as well as to program allies such as architects, engineers, and professional associations (e.g., the United States Green Business Council ("USGBC")). Targeted advertisements in industry/trade publications will also be required to bring awareness to the opportunities and savings available through the Prescriptive, Custom, and Energy Management program components. Furthermore, specialized marketing, engagement, and engineering assistance will be utilized to enhance program participation by utilizing CSP personnel to assist with specialized equipment applications, whole building type solutions and studies, and other technical assistance related to energy efficiency opportunities under these components recognizing the increasing complexity of new lighting, HVAC, controls, energy management, and other technologies to foster component participation.

The program components will be marketed, where practical, in conjunction with the other Energy Solutions for Business program offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers.

The CSP for the Multifamily program component will develop and administer the marketing plan for this component, which will be marketed to non-residential metered multifamily property owners, property managers, and residents, including income-qualified occupants and owners of multifamily buildings. The CSP will develop and disseminate clear information and program marketing materials to multifamily property managers regarding the measures, incentives, and cost sharing requirements that will be available to them to improve the energy efficiency of their properties. The Company will share this information and program marketing materials at its stakeholder meetings. The program component will be marketed to customers and program allies through the program component website. The program component will also use targeted outreach such as direct calls, direct mail, email, or other targeted outreach campaigns. Web-based information and online applications may be utilized. In addition, each participant will be given marketing materials for other applicable program offerings at the time of the audit. The CSP will attempt to follow up with participants to measure satisfaction with the program component in general and with delivery personnel. The CSP will also identify customers who did not complete additional retrofit measures to understand the barriers to moving forward with comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program design.

Daily Load Shifting and Peak Demand Reduction Program Component:

The marketing of this component will be provided by the CSP(s) under the direction of Company personnel. Marketing activities will target customers to inform them of the component offerings and the benefits of participation. For the DLS and PDR component of the program, the Company or the CSP may also recruit device manufacturers, providers, and other program allies throughout implementation to promote and achieve customer participation. The Company or the CSP may also market and/or cross market the component offerings to customers in conjunction with or through other Company program offerings (e.g. smart thermostat rebates).

**Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., \$ per measure, \$ per kWh or MW saved)
See Table 8**

Refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the term of this Phase V Plan, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications that are available from participating retailers, the program website, or participating contractors;
- Online rebate forms or instant rebates through a dedicated website;
- Midstream/upstream incentives provided through participating distributors and/or retail outlets; and
- For DLS and PDR subcomponents - Initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year.

In instances where incentives are not immediate, the Company will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the

right to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual report.

For the Multifamily program component, the Company will provide an enhanced incentive of up to 80% in common areas and 100% in low-income tenant spaces of multifamily buildings. If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for the enhanced low-income incentives. Additionally, low-income housing programs that include housing types supported through local, state, or federal funds and have independent eligibility guidelines will also be considered categorically eligible for enhanced low-income incentives through the Multifamily program component, as established by the Company's compliance filing with the Commission.

For the DLS and PDR program component, diesel and other fossil fuel backup generators are excluded from eligibility, so long as such exclusion does not impede the Company's ability to meet its targets. In all cases, customers who receive incentives from the DLS and PDR program component will be required to comply with local air quality standards.

For the FTM program component, eligible measures include installation energy system upgrades, installation of equipment (e.g., solar or energy storage equipment) on the energy delivery system, or enhanced system operations that achieve energy savings and peak load reductions. There are no incentives associated with FTM EE&C measures included in the Company's Plan.

The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC

For EE&C component offerings, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon customer response and market conditions over the Phase V Period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with program component performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultants, or CSPs, stakeholder input, and industry benchmarking. Incentives will vary depending on factors, including, but not limited to, the specific program component, end-use and measure, the incremental cost of efficient technology, and the product maturity in the marketplace.

For the DLS and PDR component of this program, the proposed level of incentives was primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company.

Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be post marked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

Key schedule milestones

As detailed under the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- October 24, 2025: RFP issued for program implementation CSP(s)
- November 26, 2025: Phase V Plan filed with the PA PUC
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program implementation begins

Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document estimated savings by the Commission's statewide evaluator (SWE)

The Company's CSP for EM&V services will be required to perform evaluation, measurement, and verification of the program in accordance with the state's Evaluation Framework. Anticipated activities for this program may include:

For the pre-installation phase, for a sample of participants, the Company will verify that existing inefficient equipment (e.g., HVAC, lighting, food services equipment plug loads and controls) is installed and working on customers' premises. The Company will also determine current total energy consumption and demand using billing/meter information and will check sample calculations of projected savings and assumptions (e.g., EFLH) for accuracy and for compliance with the PA TRM guidelines. Pre-approval providing the opportunity for pre-installation inspections may be required for certain measures and projects.

For the post-installation phase, the Company will verify through verification inspections that new, more efficient equipment has been installed and will document, store, and send measure data to the SWE using specified data transmission protocols, processes, and technology.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that energy savings and demand reduction are being realized as projected. A tracking and reporting system will be used for such monitoring. If EE&C program indicators show that projected EE&C targets are not likely to be achieved on schedule and within budget, the Company will take appropriate corrective actions, which may include adjusting incentives.

For the FTM component of this program, the Company, in coordination with its Independent EM&V Contractor, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions and will include the results in its subsequent semi-

annual reports. This will include a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.

For the DLS and PDR component, the Connected Device subcomponent will utilize AMI, and/or device data analytics to evaluate the usage reduction during peak load events. The Custom Demand Response and Connected Device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate.

The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes and technology.

Administrative requirements- include internal and external staffing levels on a full-time equivalent (FTE) basis

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. See Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

See Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$1.0M, which represents approximately 5 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

Please refer to Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

For the FTM component of this program, FTM measures are limited to ten percent of the EE&C plan portfolio of MWh and MW savings in accordance with the Commission's Implementation Order. While no energy savings, demand reductions or allocation of funding were included in the projections, the Company intends to identify Company and project developer initiatives implemented during Phase V supporting energy savings and system load relief. See 3.1.6 for additional information.

Estimated participation – include tables with key assumptions of estimated participation. See Table 9.

See Appendix B, Table 9

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

Please reference Appendix B, Table 10.

For the FTM component of this program, the program budget includes administrative, tracking and reporting and evaluation costs provided by the Company's EE&C staff and or its implementation CSPs

To timely and efficiently respond to market conditions and sustain program operations and momentum, support increased customer participation and benefits, and the Company's ability and efforts to achieve its goals, the Company reserves the right to reallocate up to 10% of the total Program budget between sectors and programs. The Company will include discussion and tables detailing any reallocation of program budgets as part of its semi-annual reports.

Estimated percentage of sector budget attributed to program

See Appendix B, Table 6, Appendix B, Table 10 and 12.

Cost-effectiveness- include gross and net TRC and NTG ratio for each program. For gross tables, NTGR should be "1.0." See Table 14, Gross and Net versions (2025 IO at 217-221)

See Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. See Appendix B, Table 8 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.

Other utility programs were not benchmarked for the purposes of EE&C program design or program participation assumptions. See Sections 1.2, 3.1 and 3.2 for information used to inform the program design and program participation assumptions.

Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations.

Small C&I Sector ("SCI") program was designed to target small business customers including multifamily dwellings. The multifamily program component includes residential type incentive offerings directed or targeted at non-residential metered multifamily property owners, property

managers and residents, including income qualified and new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing commercial property owners, property managers, and residents with energy efficiency education as well as information regarding other program services and opportunities upon which they can act.

SCI multifamily programs incorporate strategies to change behaviors and include incentives to address the initial cost barrier to promote the participation of multifamily customers. The programs provide opportunities for direct install and prescriptive incentives so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase efficiency.

SCI multifamily retrofit and new construction measures engage property owners, builders, developers, contractors, and program allies in providing comprehensive measures for this component.

For Phase V, to further drive participation and energy savings to all forms of small business customers, including multifamily owners and residents, the Company plans to collaborate with third party program administrators to identify and assist customers in participating in braided funding opportunities for qualifying energy efficiency projects. Programs such as IRA HER and IRA HEAR are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. See Section 4.4 for additional information on braided funding program component.

Other information deemed appropriate

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. The following summarizes key changes to this program for Phase V:

Prescriptive and Custom— Consolidated under one program but otherwise a continuation of the programs and program components from the Phase IV Plan with the following key changes:

Appliance Recycling SCI Program Component:

- Updated incentive amounts
- Added new measures for LV Refrigerators (Mini Fridge) and Coolers

Appliance Rebate SCI Program Component:

- Updated incentive amounts
- Consolidated multiple tiers for Clothes Washers into one measure for clothes washers
- Anticipated code changes will be adopted in their respective year and result in separate measures across the program timeline. (Refrigerators, Freezers, Clothes Dryers and Heat Pump Water Heaters)
- Removed Measures – Water Coolers

Consumer Electrics Component – Removed

Food Service Component

- Updated Incentive Amounts
- Removed Measures – ENERGYSTAR Beverage Vending Machine, Coffee Brewer
- New Measure – Refrig/Freezer Special Doors (low/no anti-sweat)

Prescriptive Component

- Updated Incentive Amounts
- Removed Measures – Linear Fluorescent
- New Measures – Reach in Refrig/Freezer Occupancy Sensor, Midstream Lighting Controls

Custom Component

- Updated Incentive Amounts
- Consolidated Under Customer Component – Process Improvement, Motors, Equipment Servers, HVAC/Chiller/Controls, VFDs
- Added measures for CHP and Solar focus

Agriculture Component

- Updated Incentive Amounts
- Removed Measure – Dairy Refrigeration Tune Up

Energy Management - continuation of the programs and program components from the Phase IV Plan with the following key changes:

Strategic Energy Management Program Component

- Updated incentive amounts
- Expanded customer engagement through targeted outreach, energy audits, advisory, consultation and technical support services

Daily Load Shifting and Peak Demand Reduction – New Component

- Added a new Load Shifting and Peak Demand Reduction –initially targets control of connected devices and custom demand response measures for C&I customers. The program will be set up to begin implementation starting summer 2026.

Front of Meter (FTM) Program – New Component

- Through implementation of the Company's LTIP, O&M plans, and other Company or project developer initiatives, improvements to the Company's energy delivery systems and installation of equipment (e.g., solar photovoltaic and battery energy storage systems) will be designed and implemented that deliver energy savings and peak load reductions for customers and the delivery system.

3.4 Large C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).

The table below summarizes the Large C&I program included in the Phase V Plan, along with a detailed description:

FE PA Table 6: New Large C/I Programs

FE PA Table 6: Large C/I Programs & Descriptions	
Proposed Phase V Program	Program Description
Large Commercial & Industrial Programs	
C&I Energy Solutions Program - Large	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.

Below is further information for the Commercial/Industrial Large sector included in the Phase V Plan:

Program Name and Program years during which program will be implemented

C&I Energy Solutions Program - Large

Program years during which program will be implemented

June 2026 - May 2031

Objective(s)

A primary objective of this program is to promote the installation of energy efficient equipment and to increase the efficiency of processes, buildings, building operations, and systems among large commercial and industrial customers, including GNI customers. The program provides customer engagement with educational and efficiency measures in addition to prescriptive, calculated, or performance-based incentives or midstream or upstream incentives or buydowns and provides support to manufacturers, distributors, contractors, and retailers that sell energy efficient products. Another objective of the program is to promote the installation of energy efficient

equipment and to increase the efficiency of processes, buildings, building operations, and systems among small business customers.

This program includes a FTM component - The primary objective of the FTM component of this program is to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and can help mitigate growing resource adequacy concerns in the State.

This program also includes a DLS and PDR component. The objective of the DLS and PDR program component is to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. This component includes a combination of event based and daily load shifting strategies including but not limited to connected device load shifting and custom demand response tailored to customer opportunities.

Target market – including market size to help frame participation estimates (e.g. number of households, electric sales etc.).

For the EE&C Program Components, the target market generally includes all large commercial and industrial customers, including GNI customers, of the Company that have program eligible applications or meet other program prerequisites. More specifically, the Company has approximately 16,000 large commercial and industrial customers, and the target market for this program ranges from the Prescriptive component which typically applies to a large percentage or broad range of the customer population to the Energy Management component that promotes eligible measures tailored to the customer's business type or industry, which will generally apply to a small subset of the overall customer base.

For the DLS and PDR Component, the target market includes all large commercial and industrial customers of the Company in the Company's service territories with qualifying connected devices or customers with custom DLS and PDR opportunities during daily summer and winter peak hours.

The Company developed participation projections in consideration of many factors (e.g., historical performance, input from its Consultant, implementation team and other stakeholders, etc.) as discussed in section 1.2, which inherently incorporates the target market for each program's components and measures. See Appendix B, Table 9 for a list of participation assumptions by measure. estimates considering but not limited to Phase IV past program performance, anticipated

If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports.

Program description

The C&I Energy Solutions – Large Program is an umbrella program that engages large C&I customers through multiple program components to provide energy efficiency and energy usage education and awareness. The program is designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels and provide financial support through prescriptive or performance-based incentives to the large commercial and industrial customers, including GNI customers, who implement qualifying high efficiency equipment, retrofit specialized processes and applications to higher efficiency processes and applications, retro-commissioning, or high efficiency building shell or system improvements. Prescriptive and performance incentives are intended to reduce the customer's capital investment for qualifying high efficiency equipment, processes, and systems. The LCI Program includes the Multifamily, Prescriptive, Custom, Energy Management, FTM, and DLS and PDR program components, and are described as follows:

Multifamily: The Multifamily program component provides customer engagement with energy efficiency education through energy assessments and the installation of standard energy savings measures and provides or promotes energy savings opportunities, including prescriptive equipment replacement and custom retrofit projects, in both common areas and tenant spaces. In addition, the Multifamily component will target low- income/affordable housing properties with enhanced incentives and measures. Customers will begin participation in the Multifamily component with an energy assessment and installation of standard energy savings measures. The assessment will identify and recommend additional energy savings opportunities that are specific to each customer and building and could include incentives for prescriptive equipment replacement or custom retrofit opportunities.

Prescriptive and Custom: The Prescriptive and Custom program components will promote the installation of high-efficiency equipment by the Company' large commercial and industrial customers, including GNI customers, either via the installation of prescriptive or custom measures or projects. The Prescriptive program component provides prescriptive-based incentives to large businesses, including GNI customers, to purchase and install energy efficient equipment and appliances. This program component also provides prescriptive-based incentives to large commercial and industrial customers, including GNI customers, to purchase and install energy efficient equipment that are residential type appliances that reside within a large commercial and industrial customer's facility (e.g., break rooms, small kitchens, etc.) as well as the removal and recycling of qualifying inefficient, operating appliances. (Periodic events may be offered at centralized drop-off locations where customers can drop off smaller qualified inefficient operating appliances such as, but not limited to, dehumidifiers and room air conditioners.)

Prescriptive incentives will be offered for individual applications and retrofit projects employing standard efficient technologies where the anticipated energy savings are relatively consistent. These measures will incentivize energy efficient lighting, heating and cooling equipment, agricultural and food service equipment, and residential grade appliances among other efficiency measures. The Prescriptive program component will support and/or provide downstream approaches and may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors, and retailers that sell select energy efficient products. Type and value of incentive provided

will vary and will include electric technologies that improve energy efficiency. Up-front rebates will be offered to reduce first cost barriers.

Prescriptive measures are designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels. Prescriptive rebates are designed to: Provide incentives to facility owners and operators for the installation of high efficiency equipment and controls. Promote the marketing of high efficiency measures by trade allies, such as electrical contractors, mechanical contractors, and their distributors, to increase market demand. Ensure that the participation process is clear and simple. Prescriptive incentives will increase adoption of energy efficient equipment by harnessing the Company' unique customer relationships to positively impact the sales process surrounding efficient equipment, from education and awareness with customers to engagement with trade ally contractors and equipment distributors for the high efficiency equipment.

The Custom program component includes custom measures that promote electric efficient opportunities for large commercial and industrial customers, including GNI customers, that are non-standard and not captured by prescriptive equipment. Calculated or performance-based incentives will be provided to customers for upgrading less efficient specialized processes and applications (e.g., variable frequency drives, motors, compressed air, equipment replacement, CHP, photovoltaic (solar PV), industrial process changes, data centers, etc.) to high efficiency specialized processes and applications. This program component also provides incentives for customers to install specialized building shell or improvements for new construction or renovation projects. Calculated or performance-based incentives are designed to reduce the customer's capital investment for qualifying energy efficient measures.

Typical custom measures that are eligible for incentives are either less common measures or efficiency opportunities in specialized applications that may include manufacturing or industry-specific processes, or non-traditional use cases. In many cases, custom efficiency projects are more complex than prescriptive equipment replacement.

Potential participants in both the Prescriptive and Custom program components are recommended to submit an application for pre-approval to confirm project eligibility and reserve funding. The Company and/or their CSP will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program component requirements, terms and conditions, and general information. In addition, the Company and/or its CSP will provide applications in web ready formats to ensure participants have easy access to the forms. The pre-approval process provides for the review of the customer's proposed project to confirm measure eligibility and incentive budget availability. This also supports Company's program and program component management because it communicates projects that are in the pipeline. If accepted and pre-approved by the Company, a timeline is established for project completion to qualify for a rebate. The typical lead time for completing a project is 90 to 120 days but can be longer depending on the complexity of the project. Large projects, or subsets of projects, may be required to undergo pre-and post-inspection to validate project energy savings.

Energy Management: The Energy Management program component targets energy savings for existing large commercial and industrial facilities by providing a holistic approach to improving building energy performance through the maintenance and retro-commissioning services for existing buildings and through the implementation of energy savings strategies that improve the overall operation and energy performance of buildings and building systems. This program component complements the Prescriptive and Custom components, which focus on capital equipment replacement or process improvement investments by improving the energy performance of a building by retrofitting, maintaining, adjusting, and optimizing the systems within the building and the implementation of complementary energy savings measures. The program component also provides paths to track the ongoing building energy performance by using retro-commissioning which ensures continued energy performance. By implementing these measures, customers also receive ancillary benefits, including improved occupant comfort, lower maintenance costs, and extended equipment life.

This program component includes strategies or implementation efforts that focus on specific energy efficiency measures and management practices that can be categorized as follows:

- **Retro-Commissioning (RCx):** Provides a comprehensive assessment of a customer's commercial/industrial building by using a prescribed planning process that includes a building audit, development of an action plan for the building, and development of a Measurement and Verification (M&V) plan to ensure the optimum on-going performance of the building and building systems. A comprehensive assessment of a commercial/industrial building using a prescribed planning and implementation process, including:
 - Audit Phase – Customer confirms intent to participate in program and registers with the Company or the third-party implementation contractor. Customer and/or the customer's consultant completes the required level of an American Society of Heating, Refrigerating, and ASHRAE audit based on the complexity of the facility and develops a retro-commissioning implementation plan, including project timelines and plan to implement audit identified operation and maintenance measures. There may be opportunities to complete this Phase without a full ASHRAE level audit.
 - Setup Phase – Contracted services to implement the plan are verified, long-term monitoring and reporting is developed and initiated, and project plan is implemented by customer.
 - Measurement and Verification (M&V) Phase – Savings verification and rebate payment from implementation of the plan are completed.

Typical Retro-Commissioning measures include, but are not limited to:

- Optimizing chiller and boiler operations to better match building load conditions reducing ventilation in over-ventilated areas.
- Fixing ventilation dampers that are open when they should be closed or vice versa.
- Decreasing supply air pressure setpoint and system rebalancing.

- Aligning zone temperature setpoints to match the building's actual operating schedule.

Monitoring-Based Commissioning ("MBCx"): Monitoring-Based Commissioning ("MBCx") offers monitoring software paired with a building's energy management system to identify energy savings opportunities and optimize building performance and EE. Contracted services will alert the customer when equipment is not operating as expected using fault parameters and will work with the customer to correct ongoing issues and make improvements wherever possible. Planning and implementation typically includes, but is not limited to:

- Assessment and qualification of a building energy management system. Assess utility bills and facility to recognize potential for energy savings.
- Customer agrees to have contracted services utilize eligible software with diagnostics and other functionality through a monitoring service contract.
- MBCx is designed to:
 - Maximize potential incentives with a deeper dive into a building's overall performance
 - Monitor and identify cost savings opportunities
 - Benefit from a continuous process to improve comfort and optimize energy usage
 - Maximize the operational efficiency of buildings

Virtual Commissioning ("VCx"): As an alternative to performing an on-site audit to develop a retro-commissioning plan, or as an additional complementary measure, VCx provides eligible customers with an analysis of their building's energy performance. This analysis uses meter usage/other data and building modeling to identify and recommend energy efficiency measures and operational changes to improve a building's overall energy performance. The process starts with benchmarking, peer comparison metrics (aids in determining energy performance to identify facilities that are underperforming) and then moves to facility assessments; site facility assessments may be 100% virtual or include onsite work depending on customer needs and identified measures. The analysis will foster participation in the Company's other programs by identifying and encouraging customers to implement other energy efficiency improvements. This offering can also use continuous engagement, monitoring, and periodic reviews of the customer's energy usage to ensure that implemented measures or changes have been successfully completed. The use of building analysis using remote analysis techniques will also help customers to participate in the programs because of limited or constrained access to customers' facilities.

- Strategic Energy Management (SEM) / Virtual SEM - Strategic Energy Management ("SEM") subcomponent is designed to optimize energy consumption for small C&I customers through long term management of existing systems and processes (including behavior), as well as tracking and benchmarking performance to identify and evaluate energy optimization efforts. Long term SEM efforts are typically focused on developing and executing an energy management strategy. This strategy is formulated through a series of site and/or remote visits and interviews with building owners and staff to

specifically develop a Strategic Energy Management Plan (“SEMP”) for the customer’s facility. The SEMP will be reviewed with the customer by the Company and/or its CSP on a scheduled basis. This plan may include:

- Revisions or improvements to an existing Building Automation System (“BAS”) or the addition and initiation of the use of a BAS to monitor and control the buildings components and systems. The implementation or improvements to a BAS or the review of an existing BAS, can include the proper training for building operators to achieve maximum efficiency.
- Development of a maintenance plan for existing building mechanical/electrical equipment and or systems to identify best practices in building performance and an interactive monitoring of system equipment by both staff and sponsoring utilities.
- Ongoing engagement to track energy usage and performance, assist with planning energy efficiency projects, and interact with facility personnel to adopt energy efficiency strategies and behaviors.
- Utilizing other Program offerings, including: Prescriptive/Custom measures, RCx, and VCx.
- Using building modeling and benchmarking to compare customer’s usage and performance to cohort of similar facilities and VCx to track energy usage and performance over time.
- Application of whole building energy modeling tools that can model buildings for both operational and capital improvements.
- Scheduling of attendance of customer personnel to attend educational workshops, webinars, and group/individual training sessions with cohorts of facility managers (e.g., Building Operations Training)
- Recommendation/Coordination for additional funding sources and financing options
- Building Operations Training Provides incentives and/or training for qualified personnel, contractors, consultants, and customer building operation personnel, to participate in nationally recognized training and workforce development, which may include O&M training and certification programs related to the efficient design, operations, and maintenance of buildings, such as BOC through a certified training program.

Customers can participate by application to the program or may be contacted directly by program personnel. Customers can participate individually or in a cohort with other customers in the same industry. The cohort would allow customers to share best practices amongst each other as each customer goes through the SEM program lifecycle. A customer would still be treated as an individual unique project within the cohort. The program will retrieve customer demographics and obtain customer agreement for the services to be provided and facilitate ongoing customer engagement. The Company’s CSP will develop application forms for this program that will guide applicants through eligibility guidelines, terms and conditions, and general program information requirements. In addition, the program will provide applications in web-ready formats to ensure participants and potential customers have easy access to the forms.

Supplemental program services include providing additional customer engagement, advisory, energy analysis and technical consulting services to help identify, promote, develop and implement projects under this program component, including but not limited to:

- Perform a Level 1 or 2 ASHRAE Audit of commercial or industrial facility or complete an engineering study that evaluates alternatives for the design of a system or process for a commercial building or industrial facility.
- Benchmarking of customer buildings and facilities
- Tracking customer EE&C metrics e.g., Lifetime/Lifecycle energy savings, Peak Demand savings

Front-Of-The-Meter (“FTM”): Through implementation of upgraded designs, equipment and operation of the Company’s energy delivery system, the FTM component will deliver system energy savings and peak load reductions. Company and project developer initiatives supporting such system load relief include but are not limited to the Company’s LTIP, its O&M plans, and other Company or project developer initiatives. Under the FTM program component, the Company will coordinate with these FTM initiatives and operations to target energy savings and peak load reductions from the corresponding improvements.

Potential improvements that can provide energy savings and peak load reductions include but are not limited to: replacement of and upgrades to energy delivery equipment, voltage optimization (e.g., Conservation Voltage Reduction (“CVR”)), efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar photovoltaic projects that are not associated with an existing retail meter.

Daily Load Shifting (“DLS”) and Peak Demand Reduction (“PDR”): The C&I DLS and PDR program component is comprised of two program subcomponents - Connected Devices and Custom. Each subcomponent is designed to deliver load reductions on a daily and/or peak day event basis.

- Connected Devices: Participating customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods. This subcomponent includes customers’ smart thermostats for control of heating, ventilation and air conditioning equipment, managed charging of electric vehicles, and battery storage or other potential customer equipment to reduce load of connected devices during peak load periods. This subcomponent will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance.
- Custom: The Custom subcomponent targets Commercial and Industrial customers to reduce load during peak load hours on a daily, scheduled, or event basis during the PA Act 129 summer and winter peak load periods through behavioral messaging, operations or process changes, equipment adjustments, controls or other specialized approaches adopted by the customer.

If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.

The Commercial and Industrial Programs were designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all customers. Commercial businesses and industrial customers are also addressed through programs that provide opportunities including prescriptive rebates, custom measures, building tune-up, and whole building/comprehensive solutions. The programs include specific opportunities that ensure access for large customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. And the programs include opportunities that encourage customers to consider a holistic approach to Energy Efficiency for customers who are interested and able to participate in whole building/comprehensive solutions.

Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.

With oversight from the Company, the CSP(s) hired by the Company to implement the C&I Energy Solutions program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and also other Act 129 programs where applicable. The program components will be marketed, where practical, in conjunction with the other C&I Energy Solutions program component offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers. As part of these activities, time will be spent detailing the various program components as well as applicable other Act 129 programs to the various participating program allies, contractors and customers.

Implementation strategy (including expected changes that may occur in different program years)

The Company will outsource the implementation of this program to CSP(s) who will be responsible to administer, promote, and provide the program to customers, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP(s) will be responsible for administration, marketing, outreach, fulfilling program services, application processing, and documentation regarding purchased products and completed projects, and processing incentives and rebates, where applicable. The Company will review the application processes with its Phase V CSP(s) to identify and make improvements, as warranted, and will require the program CSP(s) to consider

innovative outreach activities to engage customers, program allies, and trade allies throughout the implementation of the program.

The Company will perform overall administration and oversight of the program. The Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026.

Program information and links to program applications will be made available at the Company's program website. Completed applications to the program components will be processed online or returned via email, where applicable. For Phase V, pre-approved projects that are not completed prior to the conclusion of Phase IV will be processed as part of the same Phase V program without re-application, consistent with the Company's review and eligibility requirements. The Company will consider other methods for providing rebates and other rebate application processes based on market considerations and opportunities that are identified during program implementation.

The Prescriptive and Custom program components will offer an on-line application portal for customers to submit rebates for energy efficient products or projects and may also develop a midstream approach, work with retailers, contractors, distributors and/or manufacturers for midstream or upstream incentives or point of purchase buydowns for select measures. The CSP(s) will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program requirements, terms and conditions, and general information. In addition, the CSP(s) will provide applications in web ready formats to ensure participants have easy access to the forms. Additionally, the CSP(s) will provide support and assistance to retailers or distributors to support identification and promotion of qualifying energy efficient products. The CSP(s) will also provide technical support to customers on the application of the energy efficiency measures and technologies included in these program components.

Additionally, for a number of appliances that will be offered incentives through the Company's prescriptive component, the Company expects federal standard changes to happen mid cycle and therefore will impact savings in a downward manner once these changes take place. The Company will work with its evaluator and the SWE to determine specific adoption of timing and savings impacts for the change.

The CSP for the Multifamily program component will provide targeted marketing to both multifamily customers and program allies to ensure awareness of the program and enhance customer participation. The CSP may also contract with qualified auditor(s) to provide the component services to customers, who will conduct marketing and the direct installation and retrofit aspects of this program component.

The CSP for the Energy Management program component will conduct implementation aspects of this component to customers. Marketing will target specific customer types and program

allies to ensure awareness of the component and its subcomponents and enhance customer participation. Additional targeted marketing will be completed to promote this program component and enhance participation among hard to reach large business customers. The CSP will also conduct the services provided through this program component and its subcomponents.

Customers can participate in the Multifamily and Energy Management program components by submitting an application or will be contacted directly by the CSP and/or auditors.- The CSP will retrieve customer demographics and obtain customer agreement for the services to be provided and handle on-going customer engagement. Incentives for efficiency measures implemented will be issued after the measures are purchased or completed and required documentation is submitted.

For the FTM program component, the Company will coordinate with its engineering, operations and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.

For the DLS and PDR program component, the Company plans to contract with experienced CSP(s) to implement the various subcomponents supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program. The Company will perform overall administration and oversight of the program.

For the Custom subcomponent of DLS and PDR, the Company may also contract with customers directly or with PJM Curtailment Service Providers (“PJM CSPs”). Further, the Company anticipates adjusting implementation of the various subcomponents throughout the term of Phase V to improve performance based on actual results. Such changes may include but are not limited to adjusting enrollments, marketing, customer engagement, program approaches or terms and incentives.

Leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. To promote and leverage these programs and braided funding from multiple sources to customers as they are available and applicable to relevant program components, the CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns. The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. Please reference Section 4.4 for additional information.

With regards to Alternative Energy Portfolio Standards (“AEPS”), the Company plans to promote the availability and support registrations for C&I participants of its Act 129 programs with eligible

energy efficiency projects. The Company plans to collaborate and coordinate with the PA DEP and its AEPS program administrator to promote and facilitate the registrations. See Section 4.4.3 for more information.

Program issues and risks and risk management strategy

The risks associated with this program are primarily obtaining sufficient customers to participate in the various program components. Well-established and innovative outreach and marketing techniques will be used to promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company's budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from several end uses (e.g. Solar, C&I Lighting and CHP) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other low-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to the program components include:

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Conversely, the business or economic climate may require customer costs or contributions to be reduced in order to encourage participation. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels, including at midstream and downstream.
- **Customer Awareness and Engagement:** Businesses and GNI customers may have limited resources and time to consider, pursue, or prioritize energy efficiency and may have efficiency needs not well aligned with traditional EE&C programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation. In addition to limited resources and time, other large customers may not be aware of the benefits of installing efficient equipment or completing other energy efficiency improvements. To address awareness and educational barriers, the Company will educate customers on the program opportunities and the benefits of installing efficient equipment or completing

other efficiency improvement through targeted marketing and outreach, providing program services, ensuring that incentives are easily accessible, and encouraging market transformation and stocking of efficient equipment through midstream incentives. The Company will also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of the program opportunities and available incentives.

- **Business/Operational Constraints:** Facilities often have unique operational constraints that act as a barrier to implement energy-efficiency projects and the maintenance of equipment. This barrier will be addressed by ensuring the program component operates cooperatively with participants, provides technical assistance and support, provides maintenance services, and offers timely incentives.
- **Sufficient Stocking and Availability of Efficient Products:** To support a robust marketplace for efficient equipment, the Company may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of and/or for marking down the cost of the efficient equipment at the point of sale.
- **Daily Load Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty of customer participation and program component performance with daily load shifting and demand response during summer and winter demand peak periods. More specifically, it is unknown how customers and the program components will perform in daily load shifting across over 400 hours per year and in the winter period, both of which are new to PA and across industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across the 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

Further risks include the measurement and verification of the peak load reduction impacts given new methodologies and protocols for daily load shifting. The CSP(s) for the program subcomponents will be required to monitor progress for participation and impacts, and to provide contingency associated with customer non-response or opt-outs. The CSP will also be required to provide reporting to the Company detailing its performance and to promptly react to any deficiencies.

The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, marketing/advertising, and improvement opportunities. The Company and/or the implementation CSPs will monitor participation and performance to assess, where applicable, the effectiveness of program services, outreach efforts, incentive levels, delivery methods, and

feedback from both program and trade allies, so that they can provide suggestions on how to assure that the program is continually providing customers with their needs.

Anticipated costs to participating customers

Customers will have to pay the balance of the energy efficient product, project and/or installation costs not covered by the rebate. See Appendix B, Table 8 for the incremental cost and incentive range for each measure in this program.

Note: There are no costs to customers for FTM EE&C measures included in this program. For Load Shifting and Peak Demand Reduction program component, there are no known anticipated costs for customers to participate. This program component primarily targets behavioral or operational changes and utilization of existing customer equipment for participation.

Ramp up strategy

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program components being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. Please refer to Section 1.4 and 4.1.5 for more details on ramp up.

For the DLS and PDR program component, since demand response programs were not offered in Phase IV and daily load shifting and winter demand response are new concepts for Act 129, it is anticipated that it will take four to six-months to start-and ramp up the DR program offerings. Because of this ramp up period, the Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026. This supports the CSP obtaining customer enrollments such that the Load Shifting and Peak Demand Reduction program component can begin implementation June 1, 2026. See discussion in Section 1.4 for more details on ramp up.

Marketing strategy

EE&C Program Components:

The Company will implement an aggressive, sector-based marketing campaign for the duration of the new Plan. Marketing will be used to target specific customer sectors to ensure awareness of the program components and enhance participation.

Marketing activities of the Prescriptive, Custom, and Energy Management program components will target eligible customers and program allies to inform them of the program, its components, and the associated benefits through direct mail, website, trade shows, the business customer

newsletter, and key account managers. The Company will also work with distributors and contractors to market eligible higher efficiency equipment than required by federal standards.

Additionally, the expanding list of program allies will continue to be cultivated, as they are vital to the growth in customer participation. The Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers.

The CSP(s) for the Prescriptive, Custom and Energy Management program components will target various market sectors (i.e., education, medical/health care, manufacturing, retail, food service) to enhance participation and promote a cross-section of measures applicable to each market. The Energy Management component will also outreach to building maintenance and operations personnel to promote the component including the Retro-commissioning and Strategic Energy Management measures to enhance the energy performance of their facilities.

Since prescriptive retrofits are generally one-for-one replacements, measure-specific marketing will be developed for new measures or enhanced for continuing measures. These will be delivered to sectors most likely to utilize the specific technology. Fact sheets, mailings, post cards, e-blasts, and on-location seminars will all be used to promote specific measures. Custom marketing efforts require a consistent and directed outreach to program allies, the Company's managed accounts and government accounts whose processes are compatible with the Custom program components requirements. The CSP will be required to develop and implement a diligent direct and indirect marketing plan to identify and target customers to connect them to appropriate measures using e-blasts, webinars, on-site seminars, and large customer newsletters, among other marketing and outreach initiatives. Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the program component where applicable.

The CSP(s) will identify and describe participation pathways for industry-specific customer segments, including, at a minimum, agriculture and data center customers, where such pathways are cost-effective and consistent with Act 129 requirements and the Company's Plan. Further, in order to attract multiple measure participation, the CSP will conduct outreach via sectors (e.g., medical facilities for lighting, HVAC, custom processes, and CHP) and to program allies, such as architects, engineers and professional associations (e.g., the USGBC). Targeted advertisements in industry/trade publications will also be required to bring awareness to the opportunities and savings available through the Prescriptive, Custom, and Energy Management program components. Furthermore, specialized marketing, engagement, and engineering assistance will be utilized to enhance program participation by utilizing CSP personnel to assist with specialized equipment applications, whole building type solutions and studies, and other technical assistance related to energy efficiency opportunities under these components recognizing the increasing complexity of new lighting, HVAC, controls, energy management and other technologies to foster component participation.

The program components will be marketed, where practical, in conjunction with the other Energy Solutions for Business program offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers.

The CSP for the Multifamily program component will develop and administer the marketing plan for this component, which will be marketed to non-residential metered multifamily property owners, property managers, and residents, including income-qualified occupants and owners of multifamily buildings. The CSP will develop and disseminate clear information and program marketing materials to multifamily property managers regarding the measures, incentives, and cost sharing requirements that will be available to them to improve the energy efficiency of their properties. The Company will share this information and program marketing materials at its stakeholder meetings. The program component will be marketed to customers and program allies through the component website. The program component will also use targeted outreach, such as direct calls, direct mail, email, or other targeted outreach campaigns. Web-based information and online applications may be utilized. In addition, each participant will be given marketing materials for other applicable program offerings at the time of the audit.

The CSPs will attempt to follow up with participants, to measure satisfaction with the program component in general and with delivery personnel. The CSPs will also identify customers who did not complete additional retrofit measures to understand the barriers to moving forward with comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program design.

Daily Load Shifting and Peak Demand Reduction Program Component:

The marketing of this component will be provided by the CSP(s) under the direction of Company personnel. Marketing activities will target customers to inform them of the component offerings and the benefits of participation. For the DLS and PDR component of the program, the Company or the CSP may also recruit device manufacturers, providers, and other program allies throughout implementation to promote and achieve customer participation. The Company or the CSP may also market and/or cross market the component offerings to customers in conjunction with or through other Company program offerings (e.g. smart thermostat rebates).

Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., \$ per measure, \$ per kWh or MW saved). See Table 8

Refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing

standards and specifications for the eligible products under the program during the term of this Phase V Plan, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications that are available from participating retailers, the program website, or participating contractors;
- Online rebate forms or instant rebates through a dedicated website;
- Midstream/upstream incentives provided through participating distributors and/or retail outlets; and
- For DLS and PDR subcomponents - Initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year.

In instances where incentives are not immediate, the Company will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the right to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual reports.

For the Multifamily program component, the Company will provide an enhanced incentive of up to 80% in common areas and 100% in low-income tenant spaces of multifamily buildings. If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for the enhanced low-income incentives. Additionally, low-income housing programs that include housing types supported through local, state, or federal funds and have independent eligibility guidelines will also be considered categorically eligible for enhanced low-income incentives through the Multifamily program component, as established by the Company's compliance filing with the Commission.

For the DLS and PDR program component, diesel and other fossil fuel backup generators are excluded from eligibility, so long as such exclusion does not impede the Company's ability to meet its targets. In all cases, customers who receive incentives from the DLS and PDR program component will be required to comply with local air quality standards.

For the FTM program component, eligible measures include energy delivery upgrades, installation of equipment (e.g., solar or energy storage equipment) on the energy delivery system, or enhanced

system operations that achieve energy savings and peak load reductions. There are no incentives associated with FTM EE&C measures included in the Company's Plan.

The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC

For EE&C component offerings, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon customer response and market conditions over the Phase V Period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with program performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultants, or CSPs, stakeholder input, and industry benchmarking. Incentives will vary depending on factors, including, but not limited to, the specific program component, end-use and measure, the incremental cost of the efficient technology, and the product maturity in the marketplace.

For the DLS and PDR components of this program, the proposed level of incentives was primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company.

Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be post marked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

Key schedule milestones

As discussed under the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- October 24, 2025: RFP issued for program implementation CSP(s)
- November 26, 2025: Phase V Plan filed with the PA PUC
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program implementation begins

Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide evaluator (SWE)

The Company's CSP for EM&V services will be required to perform evaluation, measurement, and verification of the program in accordance with the state's Evaluation Framework. Anticipated activities for this program may include:

For the pre-installation phase, for a sample of participants, the Company will verify that existing inefficient equipment (e.g., HVAC, lighting, food services equipment and plug loads and controls) are installed and working on customers' premises. The Company will also determine current total energy consumption and demand using billing/meter information and will check sample calculations of projected savings and assumptions (e.g., EFLH) for accuracy and for compliance with the PA TRM guidelines. Pre-approval providing the opportunity for pre-installation inspections may be required for certain measures and projects.

For the post-installation phase, the Company will verify through verification inspections that new, more efficient equipment has been installed. They will document, store, and provide measure data to the SWE using specified data transmission protocols, processes, and technology.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that energy savings and demand reduction are being realized as projected. A tracking and reporting system will be used for such monitoring. If EE&C program indicators show that projected EE&C targets are not likely to be achieved on schedule and within budget, the Company will take appropriate corrective actions, which may include adjustments to incentives.

For the FTM component of this program, the Company, in coordination with its Independent EM&V Contractor, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions and will include the results in its subsequent semi-annual reports. This will include: a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.

For the DLS and PDR component, the Connected Device subcomponent will utilize AMI and/or device data analytics to evaluate the usage reduction during peak load events. The Custom Demand Response and Connected Device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments. As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate. The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes and technology.

Administrative requirements- include internal and external staffing levels expressed on a full-time equivalent (FTE) basis

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the

needs of each program. Please see Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

See Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$0.8M, which represents approximately 4 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

Please refer to Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

For the FTM component of this program, FTM measures are limited to ten percent of the EE&C plan portfolio MWh and MW savings in accordance with the Commission's Implementation Order. While no energy savings, demand reductions or allocation of funding were included in the projections, the Company intends to identify Company and project developer initiatives implemented during the course of Phase V supporting energy savings and system load relief. See 3.1.6 for additional information.

Estimated participation – include tables with key assumptions of estimated participation. See Table 9.

See Appendix B, Table 9.

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

Please refer to Appendix B, Table 10.

For the FTM component of this program, the program budget includes administrative, tracking and reporting and evaluation costs provided by the Company's EE&C staff and or its implementation CSPs

To timely and efficiently respond to market conditions and sustain program operations and momentum, support increased customer participation and benefits, and the Company's ability and efforts to achieve its goals, the Company reserves the right to reallocate up to 10% of the total Program budget between sectors and programs. The Company will include discussion and tables detailing any reallocation of program budgets as part of its semi-annual reports.

Estimated percentage of sector budget attributed to program

This information is set forth in Appendix B, Table 6, and Appendix B, Table 10 and 12.

Cost-effectiveness – include gross and net TRC and NTGR for each program. For gross tables, NTGR should be “1.0”. See Table 14, Gross and Net versions. (2025 IO at 217-221)

See Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. See Appendix B, Table 7 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.

Other utility programs were not benchmarked for the purposes of EE&C program design or program participation assumptions. Please see Sections 1.2, 3.1 and 3.2 for information used to inform the program design and program participation assumptions.

Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations.

LCI Programs were designed to target large business customers including multifamily dwellings. The multifamily program component includes residential type incentive offerings directed or targeted at non-residential metered multifamily property owners, property managers and residents, including income qualified and new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing commercial property owners, property managers, and residents with energy efficiency education as well as information regarding other program services and opportunities upon which they can act.

LCI multifamily programs incorporate strategies to change behaviors and include incentives to address the initial cost barrier to promote the participation of multifamily customers. The programs provide opportunities for direct install and prescriptive incentives so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase efficiency.

LCI multifamily retrofit and new construction measures engage property owners, builders, developers, contractors, and program allies in providing comprehensive measures for this component.

For Phase V, to further drive participation and energy savings to all forms of large business customers, including multifamily owners and residents, the Company plans to collaborate with third party program administrators to identify and assist customers in participating in braided funding opportunities for qualifying energy efficiency projects. Programs such as IRA HER and IRA HEAR are being administered by the PA DEP and with eligibility for renters and homeowners

based on area median income. Kindly refer to Section 4.4 for additional information on braided funding program component.

Other information deemed appropriate

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. The following summarizes key changes to this program for Phase V:

Prescriptive and Custom– Consolidated under one program but otherwise a continuation of the programs and program components from the Phase IV Plan with the following key changes:

Appliance Recycling Program Component:

- Updated incentive amounts
- Added new measures for LV Refrigerators (Mini Fridge) and Coolers

Appliance Rebate Program Component:

- Updated incentive amounts
- Consolidated multiple tiers for Clothes Washers into one measure for clothes washers
- Anticipated code changes will be adopted in their respective year and result in separate measures across the program timeline. (Refrigerators, Freezers, Clothes Dryers and Heat Pump Water Heaters)
- Removed Measures – Water Coolers

Consumer Electrics Component – Removed

Food Service Component

- Updated Incentive Amounts
- Removed Measures – ENERGYSTAR Beverage Vending Machine, Coffee Brewer
- New Measure – Refrig/Freezer Special Doors (low/no anti-sweat)

Prescriptive Component

- Updated Incentive Amounts
- Removed Measures – Linear Fluorescent
- New Measures – Reach in Refrig/Freezer Occupancy Sensor, Midstream Lighting Controls

Custom Component

- Updated Incentive Amounts
- Consolidated Under Customer Component – Process Improvement, Motors, Equipment Servers, HVAC/Chiller/Controls, VFDs
- Added measures for CHP and Solar focus

Energy Management - continuation of the programs and program components from the Phase IV Plan with the following key changes:

Building Tune-Up -LCI – Removed, focus shifted to custom building improvements

Strategic Energy Management Program Component

- Updated incentive amounts
- Expanded customer engagement through targeted outreach, energy audits, advisory, consultation and technical support services

Daily Load Shifting and Peak Demand Reduction – New Component

- Added a new Load Shifting and Peak Demand Reduction –initially targets control of connected devices and custom demand response measures for C&I customers. The program will be set up to begin implementation starting summer 2026.

Front of Meter (FTM) Program – New Component

- Through implementation of the Company’s LTIP, O&M plans, and other Company or project developer initiatives, improvements to the Company’s energy delivery systems and installation of equipment (e.g., solar photovoltaic and battery energy storage systems) will be designed and implemented that deliver energy savings and peak load reductions for customers and the delivery system.

3.5 *Government/Nonprofit/Institutional Sector (as defined by 66 Pa. C.S. § 2806.1) – Qualitatively describe how the Government/Nonprofit/Institutional Sector will be served.*

The Phase V Plan also continues to target and provide program services for governmental, non-profit and institutional (“GNI”) customers through the Energy Solutions programs. The Energy Solutions, Small and Large programs include components and measures aimed at serving GNI customers, including direct install, single and multiple prescriptive measures, custom projects, and Energy Management services. As in Phase IV, special efforts will be made to target the GNI customers for participation in these programs in recognition of their unique decision making and financing processes for making capital improvements to facilities. Marketing and outreach will specifically target GNI entities within the Company’s service territory depending upon the program offering. These efforts will include the leveraging of existing Company relationships and employing experienced vendors who have expertise in working with GNI accounts.

4. PROGRAM MANAGEMENT AND IMPLEMENTATION STRATEGIES

4.1 *Overview of EDC Management and Implementation Strategies:*

4.1.1 *Describe the types of services to be provided by the EDC, as well as consultants, trade allies, and CSPs. Indicate which organizations will provide which services and the basis for outsourcing versus staffing in-house. Reference reporting and EM&V information from Sections 5 and 6 below.*

The Company will provide administration and oversight of this Phase V Plan and will utilize experienced third-party vendors to perform various program implementation, delivery, and support activities as described in Section 3. Specific activities that the

Company will oversee include: (i) Plan development; (ii) the execution of outreach and marketing campaigns; (iii) quality assurance/quality control activities; (iv) Plan and program performance; and (v) tracking and reporting activities. The Company will utilize third-party vendors to provide program implementation services, including but not limited to managing and providing program operations and services as well as marketing, customer outreach and enrollment, program and trade alley engagement, application and rebate processing, EM&V, and implementation of the tracking and reporting system. The following are examples of third-party vendors that the Company anticipates using for program implementation services, either directly or indirectly:

- Qualified vendor(s) that are registered in Pennsylvania as a Conservation Service Provider.
- Equipment distributors, retailers and/or manufacturers who would promote the eligible products.
- Qualified contractors, auditors and inspectors.
- Program allies who have attended training.

4.1.2 Describe how the risk categories of performance, technology, market, policy, and evaluation can affect the programs and any risk management strategies that will be employed to mitigate those risks

There are various risks associated with the implementation of this Phase V Plan, the more significant of which are described below:

- Performance Risk is the risk that, due to design or implementation assumptions, the program does not deliver expected savings.

While modeling assumptions yielded results that support program success within budget, the Company notes the conditions under which these programs will be implemented during the Phase V Period may change. Below is a list of some of the more material risks the Company will face:

- Changing economic conditions over the life of the Phase V Plan cause concern that customers may not support the pace of participation and investment estimated and may slow the pace of mass market penetration. As an example, the full implications and current uncertainty surrounding the federal policy on tariff implementation both on the current Phase IV Plan and into the Phase V Plan are unclear. Price increases, higher inflation rates and other impacts on the market will certainly impact customers willingness or ability to participate and may disproportionately affect lower income customers.
- Newly introduced program measures included in this Plan will not have a historical basis for participation rates or experience. As a result, participation and installation rates may be lower than estimated, especially in the early years. This is particularly true for the daily load-shifting programs relative to the peak load reduction targets.

- Targeted participation rates and energy/demand savings may not be achieved due to a variety of factors, such as changing technology and standards, market trends, or incentives that are not high enough to encourage the desired energy efficiency participation and investment posing a risk to the Company's compliance both as to targets and cost effectiveness. The ability to make mid-stream adjustments on a timely basis to program measures or incentives is of paramount importance for the Company to meet its targets and allows the Company to proactively address evolving technology and market trends.

The Company has taken steps to identify and manage risks as well as to prepare for contingencies that may be necessary during the Phase V Period. Those steps are as follows:

- The Company will continue open discussion with stakeholders, seeking input from them as circumstances dictate.
- The Company will continue to consult with its CSPs to modify program implementation strategies and suggest program design or implementation changes as indicated by participation and savings results.
- The Company will continue to perform EM&V of its programs in order to ensure that all programs are reasonable in terms of dollars spent, participation rates achieved, and kWh and kW savings realized.
- The Company will continue its participation in any proceedings, rulemakings, and working groups involving issues that may affect compliance, including, as examples, those related to the PA TRM and adjustments thereto, and unforeseen changes in the economy and/or Federal and state laws that may occur during the five-year Phase V Period.
- The Company designed the demand response offerings to include a variety of program strategies, technologies and approaches through experienced CSP(s) helps the Company to mitigate uncertainties with the daily load-shifting design established for Phase V and provides the required flexibility to make adjustments over the term of Phase V to meet the Company's goals.
- The Company plans for the ability to reallocate up to 10% of the total Program budget between sectors and programs to timely and efficiently respond to market conditions and sustain program operations and momentum, support achieving customer participation and benefits, and the Company's ability and efforts to achieve its goals. The Company will include discussion detailing any reallocation of program budgets as part of its semi-annual reports.
- To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company plans for the ability to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual reports.

- The Company has developed its incentive strategy in a way that allows timely response to market trends. By employing incentive ranges as opposed to fixed amounts, the Company has the ability to timely adjust incentive levels within the approved range to maximize program participation with appropriate incentive levels.
- The Company will continue to address issues and remain committed to resolve: (i) important programmatic change requirements; (ii) potential additions that are found to be necessary and/or desirable as the Company collects and assess key program performance metrics over the course of each program's deployment and operation; and (iii) unforeseen events that may arise over the Phase V period.

Given the significant investment required to meet the energy and demand savings goals, the Company believes that it is both prudent and necessary to have a robust evaluation process in place from the date of each program's inception, as well as the capability to make those changes that are either indicated by the program evaluations and/or economic or market conditions as they change over time.

- Technology Risk is the risk that program technologies fail to deliver the savings expected.

This Plan incorporates most of the program measures and services included in the Phase IV Plan. Therefore, this risk is minimized because of the known historic results for the majority of the technologies and the market potential for future savings through these programs. However, this risk is heightened for those new or existing measures that have been modified since being implemented under the Phase IV Plan. The Company has attempted to manage this risk by leveraging measures included in the PA TRM and relying on its expert consultant, experience with similar measures used by affiliates in other jurisdictions, input from its experienced CSPs and industry research. Further, this Plan incorporates a comprehensive suite of programs that will have an immediate impact on energy use and, in the long run, should help transform the market into one where customers seek energy efficient options on a regular basis. As with the Performance Risk, the Company will continue to participate in any proceedings, rulemakings, and working groups that address issues that may have an impact on compliance with the Phase V goals.

- Market Risk is the risk that customers, or other key market players, such as retailers and contractors, are not aware of available programs, choose not to participate in a program, or cannot afford investments in energy efficiency measures that support achievement of targets.

Market risk will be assessed through program tracking and periodic surveys to gauge awareness of the programs and, for those not participating, barriers to participation. Market risk will also be assessed through periodic process evaluations. This will enable the Company to identify issues related to market risk and implement mid-course corrections to enable the programs to stay on track. The Company's use of flexible

incentive ranges, rather than fixed incentives, is a valuable tool that allows for such corrections in a timely manner. The Company will continue to evaluate various approaches to building and enhancing awareness through communications in order to minimize market risk. The Company plans to further raise customers' awareness of the benefits of energy efficiency and conservation, as well as the availability of its programs offered through this Plan, through wide-reaching educational campaigns and targeted outreach. In addition, the Company intends to utilize the relationships they have with interested parties through the stakeholder process, as well as contacts within various target markets, providing the latter with educational tools as well. Further, each program implementation CSP will also support and supplement such efforts with program specific marketing activities.

- Evaluation Risk is the risk that independent EM&V will, based on different measurement methodologies and assumptions, result in different levels of savings than those estimated in this Plan. The Company minimizes this risk through ongoing work with its EM&V consultant, insights gained through affiliate experiences in other jurisdictions, and by utilizing the PA TRM and other industry guidelines to estimate program savings. The Company and its EM&V consultant will also work with the SWE in an effort to perform EM&V activities consistent with Commission direction in a sufficiently robust manner to reliably capture all applicable program-related savings.
- Regulatory Risk is the risk that the rules governing compliance, recognition of savings estimates, reporting, or management of program budgets may change in a manner that will impair the Company's ability to meet the requirements set forth in the Phase V Implementation Order. The Company will minimize this risk through active participation in regulatory proceedings, rulemakings, and working groups, through their ongoing work with Commission Staff, the SWE, and its EM&V consultant, and by following regulatory guidance. The Company also will notify the Commission if it believes changes to its goals are necessary.

4.1.3 Describe how the EDC plans to address human resource and contractor resource constraints to ensure that adequate personnel and contractors are available to implement the EE&C plan successfully.

In the selection process for the CSPs for the Phase V programs, the Company will consider the CSP's staffing plan and capabilities to ensure sufficient human resources and contractors are dedicated or available to successfully implement the Company's Plan. Throughout implementation of this Plan, the Company will actively oversee program implementation and performance, including assessment of any human resource or contractor resource constraints and will address any associated constraints with the CSP such as working with them to augment staffing or contractors as needed or seeking additional CSPs to supplement the workforce required to successfully implement the programs.

4.1.4 Describe "early warning systems" that will be utilized to indicate progress towards the goals and whether they are likely to be met. Describe the EDC's approach and process

for shifting goals and funds, as needed, between programs and adding new measures/programs.

On a monthly basis, the Company leverages its tracking and reporting processes to closely monitor the progress of each program component toward its goals individually and for the portfolio collectively, identifying performance issues, gaps, and opportunities for improvement. Review meetings are performed at least monthly. In addition, evaluation activities will also inform how well the programs are moving toward the achievement of goals and provide additional basis upon which any recommendations for adjustments to programs are made. The majority of the evaluation work will be done by the expert EM&V consultant hired by the Company.

For the DLS and PDR program components, the Company will conduct seasonal reviews of relevant data in the Company's tracking system (e.g., participation, opt-out rates, summer and winter peak load reductions) and to review the performance of the DLS and PDR program components in its stakeholder meetings (see Section 4.1.6 for more information).

Below is a description of the Company's contingency plans should any of the following issues arise:

What if the savings do not materialize? If it is found that one or more program components are not meeting expectations, the Company may take one or more of the following actions:

- Shift the focus of underperforming program components or measures to other program components or measures that have a higher adoption rate. The Company's Phase V Plan provides a large number of measures that are rolled up into programs which provides flexibility to shift emphasis to leverage successful measures as needed to achieve program energy savings goals.
- Shift the focus or expand program measures to include new measures that may not have been well known, tested, accepted by the market, or readily available in the market at the time this Plan was designed and submitted for approval. The Company will continue to monitor the market for new measures for potential inclusion throughout the duration of the Phase V Plan.
- Adjust program delivery processes utilized in order to enhance market penetration. Options here may include: (i) having vendors add field staff to handle more inquiries or shorten response times; (ii) eliminating or adjusting project requirements if bottlenecks appear to be stalling progress; (iii) streamline or improve efficiency of implementation processes; or (iv) implementing other program implementation adjustments such as any improvements identified by process evaluations.
- Investigate issues that program allies or customers have with programs and, if deemed appropriate, modify delivery based upon the results.

- Shift program delivery or add or expand delivery channels to more aggressively promote measures.
- In extreme cases, replace non-performing program components or measures with other program components or measures that show the potential for greater success.
- Shift resources to higher performing program components. This Plan assumes customer participation based on current experience of the Company and its consultant, which, in turn, is based on, among other things, customer participation in existing programs. To the extent actual customer participation significantly differs from these assumptions, the Phase V Plan's resources may need to be rebalanced among program components or sectors to ensure that the Phase V Plan's overall objectives are met.
- Adjust rebate levels on a temporary (e.g., limited time offer or special promotion) or long-term basis to affect market response.

What mid-course corrections could be implemented? In addition to the steps discussed above, the Company believes that certain program components may be able to be ramped up through enhanced marketing efforts to drive projected kWh and kW impacts to offset underperforming program components. This may require a re-balancing of program goals and budgets. Notwithstanding, the Company's active oversight of the Phase V Plan and its program tracking and reporting processes will provide guidance for making such mid-course decisions and adjustments. The Company has human resources and infrastructure in place for analysis of such information and the development and resolution of recommendations arising from such analysis.

How will the appropriate mid-course corrections be identified? On a monthly basis, the Company conducts an internal evaluation as part of its active oversight of the Phase V Plan that reviews the progress of each program from both an energy savings and budget perspective that provides early warning for potential performance issues requiring correction. In addition, the Company will use process evaluations to determine progress and to help identify any necessary corrective actions. Process evaluations will be performed using a combination of participant satisfaction and key customer perception surveys - all performed using statistically significant samples along with a kWh and kW impact/cost analysis in which each program's performance is compared with Plan expectations.

4.1.5 *Provide implementation schedules with milestones. Describe the status of CSP solicitations and transition plans for programs or sectors that change CSPs from Phase IV to Phase V.*

The Company's EM&V Request for Proposal "RFP" was issued on September 10, 2025. The Company has selected a successful bidder and submitted the proposed CSP contract for EM&V services for the Phase V Plan to the Commission for approval as discussed in Section 4.3.2. The Company has also issued a RFP for program implementation CSP(s) for its Residential and its Commercial and Industrial programs on December 12, 2025 and October 24, 2025 respectively. The Company plans to complete its competitive bidding

process for the Phase V Plan, select the CSPs and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026.²¹ This supports the CSP finalizing staffing, program planning, set-up, marketing development and start-up activities supporting the seamless transition from the Phase IV to Phase V programs with implementation of the Phase V program components beginning June 1, 2026. The Company's Supply Chain group will be involved in the competitive bidding process to select the CSP(s) for the Phase V programs. The Company plans for all program components to be implemented at the beginning of PY18 and continuing through PY22, subject to any program modifications or other adjustments that are made throughout the Phase V Period. Please see Sections 4.1.2, 4.1.4 and 6.4 for more information regarding potential program modifications and adjustments.

The Company's goal is to maintain the momentum created through programs included in the Phase IV Plan and to leverage in the Phase V Plan the synergies created through implementation of those programs. To the extent possible, the Company's Phase V Plan assumes approval of this Plan and CSP contracts in a time frame that allows a seamless transition of programs and measures from the Phase IV Plan to the Phase V Plan, noting that: (i) Phase IV transactions will be managed to conclusion concurrent with the introduction of Phase V programs; and (ii) any applications completed prior to May 31, 2026, will be included in the Company's documentation supporting the participation towards and compliance with its Phase IV targets. The Company's implementation strategy for this Phase V Plan will rely on the use of CSP(s), partners, program allies, community-based organizations, and other entities engaged in energy efficiency to promote, communicate, deliver, and support the effective transition, deployment and implementation of the Phase V program measures and services and the suspension of any program measures and services not being continued from Phase IV.

Program implementation processes will be leveraged to the extent practical to support timely program transition from the Phase IV programs and implementation of the Phase V programs beginning June 1, 2026. The Company will use multiple CSPs to transition and implement the various programs identified in the Phase V Plan. These CSPs will be responsible for the design of the transition and start-up plan for the Phase V program offerings and measures that will be performed in an organized and efficient manner and that strives to maintain and strengthen constructive relationships with the Phase V Plan and program management, customers, program allies, and contractors.

The transition and start-up planning includes program set-up activities and will commence following Company selection of the CSP(s) for Phase V. This set-up/start-up planning will outline a process to develop the systems and procedures needed to implement and operate the various program components for the Company. The transition and start-up plan of the Phase V program offerings and measures will include, at a minimum, the identification of

²¹ Secretarial Letter issued September 8, 2025 approving the Act 129 Conservation Service Provider ("CSP") Contracts RFP Procedure for FirstEnergy's Phase V EE&C Plan, filed with the Commission on August 25, 2025 pursuant to the Act 129 Phase V Energy Efficiency and Conservation Program Final Implementation Order at Docket No. M-2025-3052826.

appropriate staffing skills and levels and the hiring of the same, the development of website(s), promotional strategies and plans, and processes ensuring quality and other controls supporting successful program transition and implementation. The transition and start-up plan will include, at a minimum:

- An organization chart and description of management roles and responsibilities;
- A description of program measures and services and dates of milestone objectives and program launch;
- A description of an implementation and operational plan for use by any subcontractor;
- A plan to facilitate or support program component tracking and reporting;
- A determination of the required information transfers between the CSPs, the Company, and the Company's other energy efficiency or tracking system contractors;
- A plan for creating, installing, and testing necessary data collection systems for program operation and evaluation;
- The establishment of a call center and the processes needed for the Company to transfer calls they receive related to the programs;
- The development of detailed processes for providing and managing rebate/incentive applications, rebate/incentive payment processes, other program services, reporting procedures, data collection and data recording processes, internal billing and related documentation to be sent to the Company for processing;
- The identification of potential CSPs and the development of processes for transactions between the two, including electronic payments between the Company and the CSPs;
- A marketing, promotion and communication plan, which includes a website strategy;
- The creation of a check processing system (if appropriate); and
- A summary of any other program specific preparations needed before the programs are launched.

The CSPs' transition and start-up will include communication and coordination with Company personnel so as to: (i) present a seamless transition for customers and program allies who either wish to participate or continue participation in programs during Phase V; (ii) maximize process efficiency and controls; and (iii) leverage the Company's relationships and communications with customers. During program transition and start-up, the CSPs will meet with the Company and its evaluation and tracking system contractors as necessary and appropriate to properly integrate the applicable program components into the Company's overall comprehensive Phase V Plan. The start-up period will include milestone objectives and targets along the timeline to completion of program startup.

Consistent with the Phase V Implementation Order, the Company will not begin implementation of the Phase V programs prior to Commission approval of the program and

CSP contracts. The Company will initiate controls to ensure that the incentives and rebates offered under the Phase V programs apply to only those measures installed and commercially operable on or before May 31, 2031. Applications completed and processed for program measures installed and commercially operable on or before May 31, 2026, as well as CSP or administrative fees related to Phase IV, are considered Phase IV expenses and will be tracked and reported accordingly. Applications completed and processed after May 31, 2026 for program measures installed and commercially operable on or before May 31, 2031, as well as CSP or administrative fees related to Phase V, are considered Phase V expenses and will also be tracked and reported accordingly. Phase V costs will be accounted for separately from Phase IV costs. Details surrounding cost recovery are set forth in Section 1.9 and Section 7.

4.1.6 Provide a brief overview of how stakeholders will be engaged throughout Phase V. Describe how low-income communities and other marginalized populations will be represented in stakeholder engagement.

During the development of this Plan, the Company sought and obtained feedback on the proposed EE&C programs from stakeholders through a variety of methods. Stakeholder meetings discussing the Phase V Plan's development, program design, and soliciting stakeholder input were held on July 30, 2025, and September 11, 2025. The Company also met with individual interested stakeholders during development of the Phase V Plan to obtain and further discuss their input. The Company also participated in numerous meetings with other interested parties, including its current and potential CSPs and vendors. The Company further involves stakeholders and stakeholder input on an on-going basis through outreach to both program allies and customers to inform program design and implementation – a practice the Company intends to continue during the Phase V Period.

During the Phase V Period, the Company will hold biannual stakeholder meetings each year, where the Company will review the performance, progress, and operation of the programs with stakeholders for collaborative discussion and feedback. At least one stakeholder meeting per year will be held in person at a central location and will include a remote option. The Company will provide notice of stakeholder meetings to all stakeholders at least 45 days in advance of the meeting, and an agenda and meeting materials will be circulated at least one week prior to the meeting. The Company will also meet with stakeholders on an as-needed, requested, or on-going basis to discuss any Plan or program aspects that warrants discussion.

During the Phase V Period, the Company plans to continue engaging local contractors, quality assurance vendors, and CBOs in Advisory Panel meetings a few times each year to obtain feedback on how the low-income and multifamily programs are operating in the field and if any updates to processes or procedures are recommended. The Company also plans to continue holding Annual Meetings with all Act 129 and LIURP contractors, quality assurance vendors, and CBOs to share ideas on the program and collaborate on how to better serve customers in local communities.

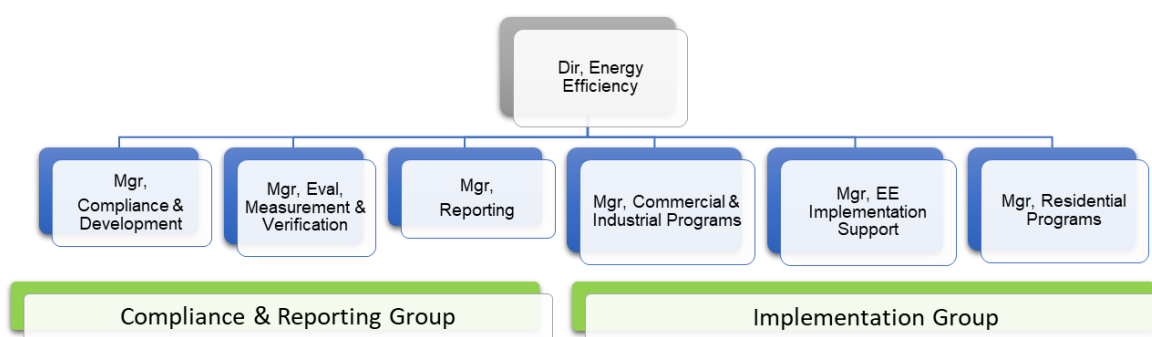
Multifamily stakeholder meetings will continue to be held during Phase V with parties such as the Pennsylvania Utility Law Project, PA Housing Alliance, National Housing Trust, National Resource Defense Council, Pennsylvania Housing Finance Agency, and others each year to obtain feedback and garner assistance from them on marketing opportunities to reach multifamily buildings owners and tenants.

4.2 Executive management structure:

4.2.1 Describe the EDC structure for addressing portfolio strategy, planning, review of program metrics, internal and external communications, budgeting and financial management, program implementation, procurement, program tracking and reporting, and quality assurance/quality control (QA/QC). Include the EDC organization chart for the management team responsible for implementing the EE&C plan.

The Energy Efficiency Department is entrusted with ensuring that the Company complies with all statutory energy efficiency and demand reduction requirements and that the approved programs are successfully implemented. This group also has responsibility for similar activities for FirstEnergy's other utility subsidiaries in other states. The organization chart set forth below depicts the management team of this group and primary areas of responsibility as they currently exist.

FE PA Figure 3: Organization Chart



The Energy Efficiency Implementation group is organized based on program management responsibilities across customer classes. Key activities include planning and executing marketing and outreach campaigns and overseeing and managing the program implementation CSPs to ensure successful program implementation. The Energy Efficiency Compliance and Reporting group is organized based on support functions that are common to all programs, such as Plan development, program evaluation, measurement and verification, and compliance tracking and reporting. The Implementation and

Compliance and Reporting groups also receive support from areas, such as but not limited to Rates and Regulatory Affairs, Legal, Customer Service, Customer Support, Information Technology (“IT”), and Communications.

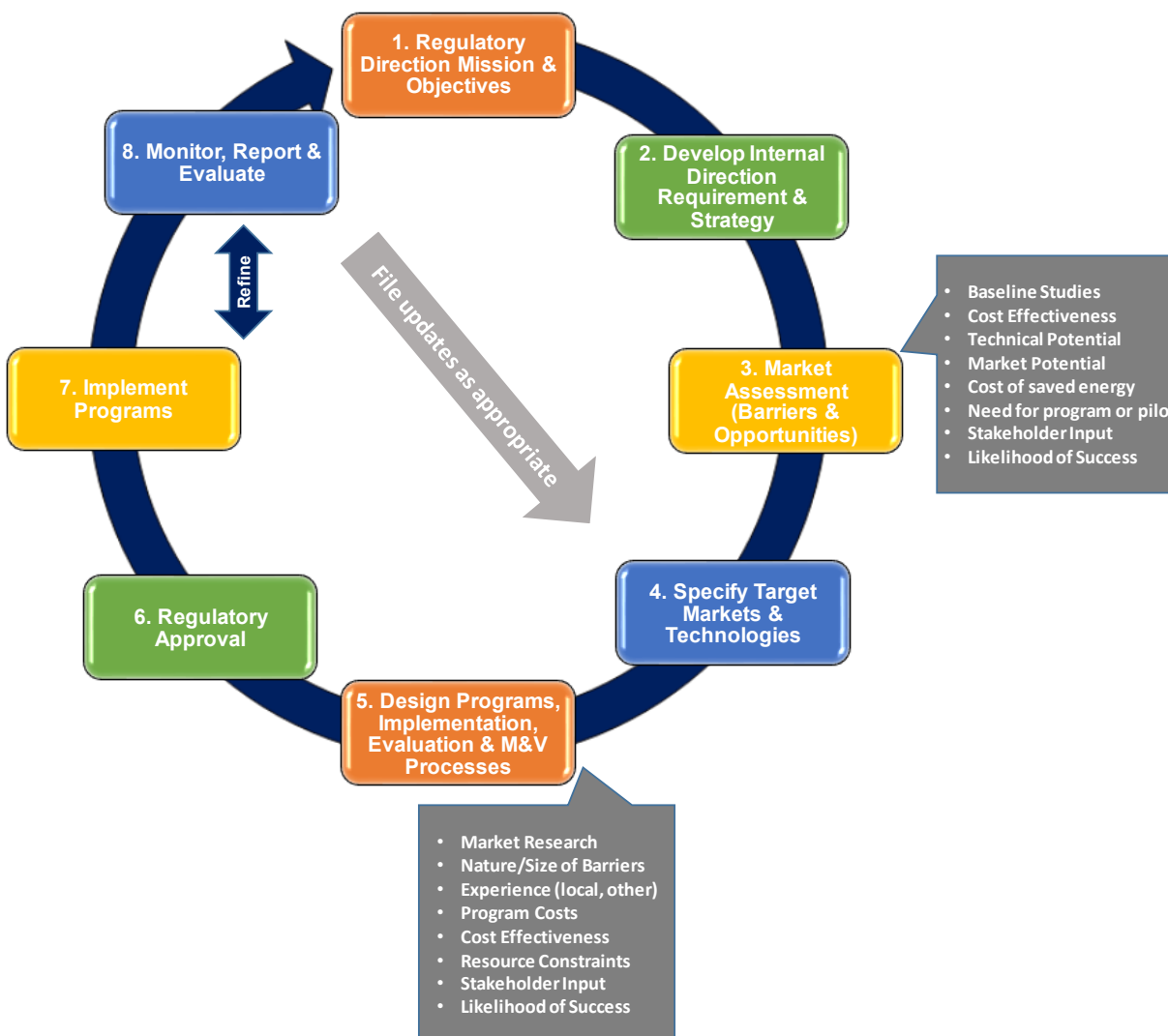
4.2.2 Describe the approach to overseeing the performance of CSPs and other contractors and how they can be managed to achieve results, within budget, and ensure customer satisfaction.

The Company will provide administrative, contract management, program implementation, and marketing oversight of the selected CSPs primarily through the Energy Efficient Department staff who are dedicated to this purpose. Not only will such monitoring be accomplished using the tracking and reporting system described in Section 5, but this dedicated staff will also provide:

- Guidance and direction to the CSPs, including review and revision of proposed implementation plans and proposed milestones, marketing campaigns and, additionally, engage with the contractor team daily when working through strategy, policy, or implementation activities or issues.
- Review and approval of CSP invoices to ensure program activities are according to contract, within investment, and on schedule.
- Review of CSP operational databases for accuracy, ensuring incorporation of data into the Company’s comprehensive tracking database to be used for overall tracking and reporting.
- Review and update of measure saving estimates maintained by the CSPs.
- Oversight and coordination of evaluation, measurement, and verification contractors.
- Participation in outreach to community groups, program allies and trade associations.
- Provision of guidance and direction on new initiatives or strategies proposed by the CSPs.
- Communication with CSPs advising of other initiatives that may provide opportunities for cross-program promotion.
- Review and approval of printed materials and advertising plans.
- Evaluation of portfolio and program effectiveness and recommendations regarding modifications to programs and program delivery as needed.
- Performance of periodic review of program metrics and evolving program design.

In addition to the comprehensive oversight activities described above, the Company will follow the overall planning, implementation, monitoring, and evaluation framework identified below to help guide its programs and contractors:

FE PA Figure 4: High Level Overview of EM&V



The Company believes that this framework, in conjunction with agility, flexibility, and a well-trained staff, will assist in its efforts to achieve the targets established by Act 129 and the Phase V Implementation Order in an efficient and cost-effective manner.

4.2.3 Describe the basis for administrative budgets and the proposed approach to accounting for EDC staff time who manage the EE&C plan.

The model used for developing the EE&C programs involves a build-up of sector specific costs based on program fixed costs and variable costs based on measure-level projections, both of which are then aggregated to the program level. Common costs are estimated at

the State level and then allocated to each program based on each program's ratio of sector specific CSP Delivery Fees and Marketing costs.

Program cost elements are categorized into Incentives and Non-Incentives consistent with the Phase V Implementation Order and the Phase V Energy Efficiency and Conservation Plan Template, Table 10: Budget by Program,²² including the following terms:

- **Incentives** – includes program specific costs for (1) rebates paid to customers, (2) upstream/midstream buydowns, (3) material cost of giveaways (e.g., kits), (4) program direct install labor and material cost provided to customers, and (5) Braided Funding Support Labor.
- **Non-Incentives** – includes both program specific and common costs associated with program design, (utility) administration, (CSP) delivery, marketing, EM&V, and other costs, as follows:
 - Program Design – includes common costs associated with the development of the Phase V Plan and programs, including costs incurred by the utility for employee labor, development, and research, design, and development related association fees.
 - Administration – includes common costs incurred by the utility for employee labor and expenses to oversee, administer and manage the portfolio, costs to develop and maintain a data collection, tracking, and reporting system, training and development, and costs to perform duties associated with activities such as regulatory reporting or meetings to support the Phase V Plan (e.g., Stakeholder meetings, technical utility staff meetings, program evaluation group meetings).
 - CSP Delivery Fees – includes program specific CSP administration costs associated with the set-up, implementation and ongoing management and delivery of programs, including staffing, contractors, websites(s), data collection and transfers, call centers, application and incentive processing, quality assurances, and control processes, and other program specific activities supporting successful program implementation.
 - Marketing – includes common utility costs and program specific CSP costs associated with marketing the plan and programs, providing general awareness and education, including costs associated with developing and providing marketing/promotional strategies, advertising space and other advertising costs, and materials.
 - EM&V – includes program specific CSP costs associated with the evaluation, measurement, and verification of the programs, including evaluation activities,

²² See *Implementation of Act 129 of 2008 – Phase V Energy Efficiency and Conservation Plan Template*, Docket No. M-2025-3052826 (Secretarial Letter dated September 8, 2025).

surveys, M&V processes, data transfer responsibilities and participation in evaluation or other program related meetings.

- AEPS Registration Support – includes program specific CSP costs associated with coordinating with the Alternative Energy Portfolio Standards (“AEPS”) program administrator and supporting customer registration of eligible projects.
- Other – includes other common costs associated with the development, regulatory review and implementation of the Phase V Plan, including outside consulting and outside legal fees.

As discussed in Section 4.2.1, the Company has an Energy Efficiency Department that is dedicated to the oversight and administration of the Company’s EE&C Plan and for those of affiliate utilities. This group charges specific accounting established for the PA EE&C Plan for its time spent on the oversight and administration of the Act 129 programs, with these costs considered “Administration” costs for the Phase V Plan and programs.

4.3 Conservation Service Providers (CSPs):

4.3.1 Provide detailed justifications for why the EDC did or did not choose to use a CSP to perform specific EE&C plan functions. Identify whether the EDC or its CSP(s) will use Community Based Organizations (CBOs) to deliver its Act 129 programs and describe the expected role(s) for CBOs within the broader CSP strategy.

The Company will perform overall administration and oversight of the Phase V Plan and will contract with experienced CSP(s) to perform the EE&C plan functions. The Company also plans for the CSP(s) for its Low-Income Energy Efficiency Program to contract with CBOs for the delivery of certain program components including those coordinated with its LIURP. The Low-Income Program coordinates with the LIURP program to have the CSPs leverage CBOs for delivery of certain program measures (e.g. Warm Plus, Warm Extra Measures, etc.) in conjunction and coordination with the LIURP program delivery.

4.3.2 List any selected CSPs, describe their qualifications and basis for selection (include contracts in Appendix). If the EDC plans to forego the competitive bidding process for any CSP, describe the rationale. Confirm that the contract value of CSP contracts that are not bid competitively is less than 1% of the total plan budget. (2025 IO at 226)

The Company’s Request for Proposal “RFP” for EM&V services for its Phase V Plan was issued on September 10, 2025. A team within the Company’s EE&C department evaluated the response and the selection was made based upon the firm possessing substantial qualifications in energy efficiency and demand response evaluation, measurement and verification. The selected bidder, ADM Associates, Inc., has worked previously with the Company in Pennsylvania and its affiliates in other jurisdictions, and has demonstrated its experience and expertise in its field, under Act 129 in Pennsylvania and in the industry. The Company’s CSP contract is being filed contemporaneously with this Plan on a

CONFIDENTIAL basis, including their qualifications and basis for selection.²³ No other CSPs have been selected at this time and other CSPs will be selected through the same approved RFP process, with exception of its Tracking and Reporting system vendor.²⁴ The contract for the Tracking and Reporting system will forgo the competitive bidding process, consistent with Commission directive,²⁵ as the Company plans to leverage its existing system, which contains historic data and contains established processes, interfaces and reports, and would require significant efforts and cost to change vendors.

The Company has and will continue to adhere to the requirements as set forth in the Phase V Implementation Order and will select all CSPs that provide consultation, design, administration and management, or advisory services to the Company through a competitive bidding process. The RFP(s) will be distributed to all qualified CSPs registered on the Commission's website, and the Company will try to acquire bids from minority or other special category businesses consistent with the Commission's Policy Statements at 52 Pa. Code §§ 69.804, 69.807 and 69.808.

4.3.3 *Describe all pending CSP solicitations for which the EDC plans to retain CSP services but has not selected the winning bidder.*

As discussed in Section 4.1.5, the Company has issued a RFP for program implementation CSP(s) for its Residential and its Commercial and Industrial programs on December 12, 2025 and October 24, 2025 respectively. These RFPs include all program components, including EE&C, Behavioral, Multifamily, and Demand Response.

4.4 *Coordination with Other State Conservation Programs:*

4.4.1 *Describe how the EDC plans to collaborate with gas and water utility and other state or federal programs to achieve savings, detailing coordinated program management, tracking and reporting of outside funds, and implementation strategies. EDCs may claim the full gross verified savings for any EE&C project they support if they also incentivize or directly install eligible electric measures. (2025 IO at 186-187)*

The Company recognizes that leveraging other conservation programs and the availability of outside funding may help to achieve its Act 129 objectives within budgetary limitations, as outside funding combined with Act 129 opportunities will elevate general awareness, improve customers' benefit-to-cost ratios, minimize the up-front investment required by customers, encourage additional participation, and thus accelerate conservation programming in the State.

²³ In accordance with Final Implementation Order at 227 and with Act 129 66 Pa. C.S. § 2806.1(b)(1)(i)(E).

²⁴ FIO at 226 "“EDC contracts pertaining to Act 129 activities such as tracking database services which do not cover implementation or EM&V may forgo the competitive bidding process with individual vendors if the cumulative value of contracts for that vendor's work does not amount to more than one percent of the EDC's Phase V budget.” The Phase V Plan budget for the T&R contract is less than 1% of the Phase V budget.

²⁵ IBID.

The Company will seek to identify federal, state, and local funding opportunities (“braided funding”), including programs of gas and water utilities within the Company’s service territory, and will pursue collaboration and coordination with these programs to provide educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to the Phase V Plan offerings. As new opportunities become available, the Company in coordination with its respective CSPs intends to collaborate with these program administrators to provide education, marketing and cross-promotion, and other assistance or support helping customers to maximize such incentives and drive overall program participation.

Specific to IRA incentives, in conjunction with the DEP and other Pennsylvania utilities, the Company plans to identify opportunities where federally funded initiatives through the IRA may complement Act 129 offerings. These programs focus on low-income customers (although not limited to) and thus will reduce low-income participants’ required investment (incremental costs). The Company plans to consider complementing its program offerings with the IRA program opportunities throughout implementation of the Phase V Plan as IRA funds are available, to leverage this available funding to further promote customer participation in its programs. The Company will work with the Pennsylvania DEP as they finalize and implement the IRA programs.

On at least an annual basis through the duration of Phase V, the Company will convene program coordination meetings with other partners, including NGDCs with overlapping service territory, LIURP providers, Weatherization Assistance Program providers, home preservation program providers, DEP, and other stakeholders and interested parties, to identify steps to improve program coordination. At a minimum, the meetings will address implementation of recommendations from the Commission’s data sharing work group, streamlined referral processes and coordinated measure delivery. The Company will provide updates regarding its coordination with other partners at the Company’s Act 129 stakeholder meetings.

The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. As they are developed and made available, the Company and its contractors will also support customer participation in these complementary programs through education, information and awareness building campaigns and other collaborative opportunities that are identified throughout the Phase V Period.

4.4.2 Discuss how the EDC will highlight the availability of multiple funding sources and provide prospective Act 129 participants information where they can learn more about external funding opportunities. (2025 IO at 190)

As discussed above in Section 4.4.1, the Company will actively seek to identify other available conservation programs and braided funding sources external to its Act 129 offerings, as identified in the Commission's TO, and other programs as they are available and applicable. Relevant external program opportunities and braided funding will be communicated through the Company CSPs, program website, and marketing materials, and program processes. Additionally educating the installation contractors and/or point-of-sale personnel regarding the various program opportunities and braided funding sources is also planned as often the contractors and retail outlets are the ones in direct contact with customers. The Company plans to collaborate with the other program and braided funding administrators to promote and support participation amongst the mutually beneficial programs that align with the Company's Phase V Plan program offerings in an aligned and efficient manner. Please see FE PA Table 7 below that identifies examples of the types collaborative opportunities currently available as identified in the Phase V Final Implementation Order, at 158, and in TIO at 54.

FE PA Table 7: External Funding

FE PA Table 7: External Funding				
External Program	Administrator	Customer Segment	Descriptions of Eligible Technologies	Source
Alternative Energy Portfolio Standards Act Credits	PAPUC Alternative Energy Credit Program	Residential and Commercial	Solar (Tier I), Demand Side Management projects, and Distributed Generations (i.e. CHP) (Tier II)	Home - Pennsylvania Alternative Energy Portfolio Standard Program
LIURP and LIHEAP	EDCs	Low Income Residential Customers	Customer education, Refrigerator/Freezer testing, Electric Water heater Inspections, Weatherization, Energy saving lightbulbs	WARM Program
DEP IRA Programs HER and HEAR	DEP	Residential Customers with a focus on Low Income	Heat Pump Water Heaters, HP Space Heating and Cooling, Electric Stove, Cooktop, Range, Oven, HP Clothes Dryers/Washer Dryer Combo, Electric Load Service Center, Insulation, Air Sealing & Ventilation, Electric Wiring	Penn Energy Savers
DEP Agricultural Energy Efficiency Rebate Program	DEP	Commercial Agricultural	State funding (grants, loans) for energy improvement projects (e.g. EE grain dryers), solar energy, LED lighting, clean fuel vehicles	Agriculture and Farming Department of Environmental Protection Commonwealth of Pennsylvania
DEP's Healthy Electrified Commercial Kitchen Rebate Program	DEP	Non profits, higher education, K-12 schools	Variety of combustion free cooking equipment, as well as associated electrical upgrades	
DEP's Reducing Industrial Sector Emissions in PA (RISE PA)	DEP	Industrial Customers	Grants for small, medium and large scale decarbonization projects	
DEP's Solar for All Program	DEP	Low Income Customers	Solar Installations	https://www.pa.gov/agencies/dep/programs-and-services/energy-programs-office/financial-options/energy-accelerator-program/solar-for-all

4.4.3 Propose a process to facilitate Alternative Energy Portfolio Standards (“AEPS”) registration for C&I participants of Act 129 programs to register their energy-efficiency projects and take advantage of the elevated AEC pricing. EDCs can design this support in a way that aligns with the needs of its customers and treat the cost of AEPS registration support as a recoverable administrative cost. (2025 IO at 182-184)

In accordance with the AEPS Act, for Tier II Alternative Energy Credits (“AECs”) and for solar PV project Tier I credits, the Company plans to promote the availability of and support registrations for C&I participants of its Act 129 programs with applicable eligible

energy-efficiency projects. The Company plans to collaborate and coordinate with the DEP and its AEPS program administrator to promote and facilitate the registrations, such as but not limited to, obtaining customers authorization to share and provide project information to the AEPS program administrator.

In more detail, the Company anticipates providing AEPS program information to customers from their eligible projects during its program processes to educate customers on the AEPS program and the potential AECs from eligible demand side management, energy efficiency measures and solar PV projects that are implemented. The Company plans to collaborate and coordinate with the AEPS Program Administrator to establish the promotional, educational, other information and support to be provided such as but not limited to obtaining customer authorization to share information to facilitate the registration of their eligible projects in accordance and alignment with the State's AEPS program.

4.4.4 *Describe plans to address health and safety issues that arise in the delivery of Act 129 services. Identify whether any programs will provide health and safety measures or services. Discuss any plans to refer Act 129 participants that could not be treated due to health and safety issues to other program administrators.*

The Company plans to coordinate with and refer participants to its LIURP or other external programs for possible eligible remediation of health and safety issues that arise in the delivery of its low-income program offerings if applicable. If other programs are not timely available or applicable, the Company will provide a portion of its Low-Income Weatherization program component budget for Health and Safety remediation, when the cost and energy savings attributable to the remediation meets program component acquisition cost based on available program funds.

The Company will also track and report in its Annual Reports the number of homes deferred and referred due to health and safety issues consistent with the reporting templates established for Phase V²⁶ and any additional requirements for tracking and reporting in accordance with the Commission's FIO or other directives.

4.4.5 *Discuss strategies to collect information about dual participation to facilitate accurate reporting on braided funding opportunities and calculation of the "leverage ratio" by program. The Phase V Implementation Order defines the leverage ratio as the amount of known external funding for Phase V EE&C*

The Company will track and report participation and funding from other external conservation programs by source, as well as calculate the leverage ratio for each program as defined in the TO²⁶ and the administrative costs associated with the Company's incremental administrative efforts to support the coordination with these programs and braiding of funds.

²⁶ TO at 55.

5. REPORTING AND TRACKING SYSTEMS

5.1 *Indicate that the EDC will provide semiannual and annual reports as prescribed in the June 18, 2025, Implementation Order.*

The Company will comply with the Commission's reporting requirements as prescribed in the Phase V Implementation Order, including both the semiannual and annual reports. As discussed in Section 4.3.2, the Company plans to continue using the Phase IV T&R CSP and the current T&R System to provide the required reports as prescribed. The System provides the ability to monitor the progress of the various programs being offered, supporting the Company's oversight and administration of the programs, and to generate the reports as required by the Commission.

Standard reports will be updated for the new requirements as outlined in the Final Implementation Order and will be provided as necessary. The format and content will be consistent with that defined by the Commission and the SWE. More specifically, the Company will track and report required information, consistent with the reporting templates established for Phase V, such as unique customer participation, savings and expenditures in specific program components (e.g., multifamily, DLS & PDR, etc.) and regarding health and safety remediation (e.g., referrals) and customers who participate in DLS & PDR components with fossil fuel backup generators.

The System also produces customized reports using a report writing tool. Summaries, dashboards, or other reporting formats will continue to be used by the Company to monitor program performance on an on-going basis.

5.2 *Program Tracking Systems:*

5.2.1 *Provide a brief overview of the data tracking system for managing and reporting measure, project, program, and portfolio activities, status, and performance, as well as EDC and CSP performance and expenditures.*

The comprehensive T&R System will report and track activities and results associated with the Company's Phase V EE&C programs. The System has the ability to track a customer through program-specific statuses. The System provides standard status reports both for individual participants and at the program level. Additional enhancements will be made to the System as deemed necessary for Phase V and the additional Phase V Implementation Order requirements, including but not limited to additional reporting requirements for comprehensive program offerings, summer and winter PDR reporting requirements, and as deemed necessary for any future requirements. In addition, the Company will continue to utilize SAP²⁷ enterprise software for financial management and reporting of program costs, including administrative costs associated with braided funding.

²⁷ SAP, which stands for System Applications and Products, is FirstEnergy's Enterprise Resource Planning (ERP) software.

5.2.2 Describe the software format, data exchange format, and database structure the EDC will use for tracking participant and savings data. Provide examples of data fields captured.

The T&R System is web-based, allowing for access from any internet connection. The System will exchange data with implementation CSP databases as necessary to gather data to upload key program metrics on a routine scheduled basis (e.g., daily, weekly or monthly) and will ensure data integrity through routine scheduled reconciliation processes. The Company will work with the implementation CSPs and the Company's EM&V consultant on a regular basis to verify the accuracy of data transferred from implementation CSP databases to the T&R System. Not only will this reduce paperwork and minimize data entry, but it will support quality control and allow for easy access to track goal attainment and budget variances. The tracking and reporting system will store various data fields where appropriate, including but not limited to:

• Customer name	• Customer contact info	• Customer type
• Customer ID number	• Account number	• Premise number
• Project/Program name	• Contractor/Retailer	• Measure
• Service address	• Job status	• Completion date
• Install Date	• Measures implemented	• Rate Code
• kWh savings	• kW savings	• Incentive

5.2.3 Describe how CSPs will integrate with the tracking system and the procedures to ensure the upload and exchange of data from CSPs to the EDCs is sound.

During the set-up period of each program, the Company's implementation and evaluation teams will work with the implementation CSP to define the list of data fields that the CSP will send to the Company's T&R System. This Data Mapping Document will include, at a minimum, all the vendor's fields, the Company's fields that they map to, and a definition of what that field is called in the vendor's source system for all the required fields. The CSPs are required to pass this data through an XML interface and to format program participation data as defined by this interface.

A File Transfer Protocol (FTP) process will be established to exchange the data between the implementation CSP and Company's T&R System. During program start-up, a testing process including test files for the data exchange will be completed, and the test data will be validated by the implementation CSP, the Company's T&R System CSP, and the

Company's Energy Efficiency Reporting team. Once technical testing is successful, an upload schedule is established, and data uploads will be scheduled on a minimum monthly basis but can be more frequent as determined by the Company to support successful program implementation.

Once production data exchanges begin with each implementation CSP, monthly validation occurs by the Company's Energy Efficiency Reporting team to ensure the data between the implementation CSP's system and Company's T&R System reconcile. Additional QA / QC validations occur for key required fields, missing document attachments where applicable, and kWh and kW reasonability. Any discrepancies that are identified between the implementation CSP's source system and Company's T&R System are reviewed and reconciled on an on-going basis between the implementation CSP and the Company's implementation, evaluation and/or reporting teams as necessary.

5.2.4 *Indicate that the EDC will fulfill all quarterly and annual data requests issued by the Commission and its SWE. Describe the level of access and mechanism for access for the Commission and its SWE.*

The Company will comply with the Commission's reporting requirements as prescribed in the Phase V Implementation Order, including both the semiannual and annual reports. The Company will contract with the current CSP to leverage the current T&R System for Phase V to provide the required reports, as described in Section 4.3.2. The format and content will be consistent with that defined by the Commission and the SWE. The T&R System is web based, thus requiring an internet connection for access. The System is designed to allow for varying levels of security-controlled access, and access for others, such as Commission staff and the SWE, will be provided as required.

5.2.5 *Describe the cybersecurity procedures the EDC will use to protect the personally identifiable information of program participants.*

The Company may gather customer-specific data during the operation of the Phase V Programs and may provide it to its CSPs, the Commission or its contractors, or other parties to support implementation and EM&V of the Company's programs. The Company will also submit non-customer-specific data to the Commission in compliance with reporting requirements, as established by the Commission. Any customer specific data will only be provided after the execution of Non-Disclosure Agreements and Company review and approval of the Commission's and/or third party's cyber and data security protocols. The Company will not share or use customer-specific data for non-utility specific Act 129 programs.

The Company will enforce privacy and data handling policies and procedures for the Phase V Programs that are consistent with FE PA's customer data security protections, the Final Implementation Order, and any applicable Commission regulations and statutory obligations. In the event of any breach of confidentiality by a CSP to deliver the Phase V programs or to evaluate the programs, the Company commits to enforcing the contractual confidentiality requirement. Any breach of security with respect to customers' personal information will be addressed in full compliance with all applicable Pennsylvania laws.

6. QUALITY ASSURANCE AND EVALUATION, MEASUREMENT AND VERIFICATION

6.1 *Describe the overall approach to quality assurance and quality control.*

During the development of this Plan, the following includes specific steps that the Company took toward quality assurance and quality control:

- Use of qualified and experienced personnel, including the Company's expert consultant, to provide input to the design of the EE&C programs;
- Selection of EE&C measures compliant with the requirements of the PA TRM or otherwise proven in the industry;
- Use of multiple approaches and strategies, and proven technologies where available, to reach both the energy savings and demand reduction targets set for the Company;
- Communication with interested parties, vendors and other stakeholders on the program designs and objectives throughout the program development process; and
- Validation of EE&C program projections and assumptions with the Company's expert consultant and implementation team.

In preparation for the implementation phase of this Plan, the Company intends to contract with experienced implementation CSPs who will provide not only the experience to support successful program implementation but also processes that accurately document and verify participation data to support achieving verified energy savings and peak load reductions – all of which will be subject to audit and review by both the Company's EM&V contractor and the SWE. The Company will also perform, directly or through third-party evaluators, its own quality assurance and control processes, including but not limited to the review and evaluation of CSP systems, in order to ensure the accuracy and reliability of the reported data and savings. Such evaluations will have the following key characteristics:

- Both deemed and custom measures will be included in the evaluation universe;
- The statistically valid sample size may cover a subset or the entire population for a particular measure;
- The frequency and sample size of these evaluations will vary based on the significance of any findings; and
- The control points used in the evaluations will target specific risks associated with the design or implementation of EE&C measures.

6.2 *Describe procedures for measure and project installation verification, quality assurance and control, and savings documentation.*

EM&V efforts evolve over time and change as programs move from initial roll-out to full-scale implementation. The Company has engaged an experienced EM&V CSP who will develop and implement EM&V processes and procedures. While EM&V plans are written on a program-by-program basis, the Company intends to utilize synergies among programs to reduce redundant work. EM&V plans may be refined over time to include best practices and lessons learned – issues periodically reviewed by the Company and its EM&V CSP.

The EM&V CSP will utilize the format required by the SWE for evaluation plans and will include the following topics:

Introduction and Program Background

Includes program description, measures covered, markets targeted, program implementation activities, applicable budgets, and expected program participation.

Evaluation Objectives

The overall objective for the impact evaluation is to quantify and validate the extent of energy saved and demand reduced as a result of a program. Process evaluation is viewed as providing the explanatory depth to improve program processes, better understand market barriers and opportunities, and support identification of opportunities for improving program implementation, including marketing and promotion, delivery, tracking, and verification. Thus, impact evaluation identifies how much of an impact a program has, while process evaluation tells you why. The Company intends to leverage results from both impact and process evaluations conducted throughout the Phase. Used in conjunction with one another, the results at a minimum will inform development of additional QA/QC initiatives, changes to implementation strategies or approaches, and/or improvements to savings documentation to ensure the success of the programs.

Overall Evaluation Approach

The Company will perform processes to meet standards specified in the Evaluation Framework and consistent with the PA TRM. Programs include documentation requirements supporting expected (“ex-ante”) impact estimates following protocols defined in the PA TRM. Samples of participant applications are selected for EM&V. After the statistically valid samples of projects are selected, and the implementation CSP provides documentation pertaining to the projects, the first step in the EM&V effort is to review the documentation. Documentation that is reviewed for all projects selected for the sample may include program forms, databases, reports, billing data, logger data, weather data, and any other potentially useful data. The Company will support metering studies independently or in coordination with other EDCs as appropriate.

Program-level gross ex post savings are calculated by applying achieved savings realization rates calculated for the analysis sample to program-level data for reported savings. Realization rates describe the relationship between verified savings and program forecasted savings estimates. The realization rates are calculated as the ratio of the EM&V CSP’s calculated measure savings to the ex-ante reported savings.

Sampling Plan

Residential Programs

Statistically valid sampling of program participants (and in some cases non-participants) will vary among the programs according to participants, measures, and methods of installation. Where appropriate, the sample will be stratified by measure using proportional

stratification. The advantage of a proportionally stratified random sample is that greater precision can be achieved than a simple random sample of the same size. Additionally, proportional stratification guards against an underrepresentation of any one particular measure. Sample stratification is particularly useful when there are clear differences in energy savings between each stratum, and when each stratum is relatively homogenous.

Commercial & Industrial Programs

EM&V sampling will occur in stages consistent with program implementation. Projects are added to the program tracking system as they are submitted and accumulate over time. As a result, sample selection is spread over the entire program year.

Stratified sampling is performed to account for skewed distributions of savings and to reduce the sample sizes required to satisfy the desired precision requirements. By developing strata such that the projects within each stratum are relatively homogeneous with respect to expected kWh savings, a smaller sample is required from each stratum in order to arrive at desired precision estimates. When performing sampling for a skewed population, stratified sampling methods are preferred because a group of projects with less variance in expected savings requires a relatively smaller sample size in order to reach a given precision and level of confidence.

Projects with high kWh and kW savings contribute significantly to the variance in expected savings and are included in the sample with certainty. The EM&V CSP will select a site-level ex ante kWh and kW threshold above which all projects at a site will be selected for the sample with certainty. The remaining projects will then be assigned to a kWh and/or kW stratum according to the level of the expected site-level kWh and kW savings and are chosen at random within each stratum.

6.3 *Describe the process for collecting and addressing participating customer, contractor, and trade ally feedback (e.g., suggestions and complaints).*

Process evaluations will be performed periodically to support program performance. Where applicable, the EM&V CSP may incorporate program manager interviews, participant (and in some cases non-participant) customer surveys, and trade ally surveys. Program manager interviews explore researchable issues and help inform the customer survey design. The interviews identify stated program goals and objectives, assess the effectiveness of the programs' operations relative to the defined program goals and objectives, capture program processes and flows, and explore potential ways to improve implementation of the programs. Surveys are used to gather data on decision-making criteria and on the attitudes and behavior of decision-makers. Participants are questioned regarding their knowledge of the program, their level of interest in the program, and their reasons for participating, and market or process barriers that could be addressed in the program design or implementation plan.

Throughout the implementation phase of this plan, the Company will obtain additional direct input from various sources, including but not limited to the implementation CSPs,

stakeholders and other EDCs for relevant developments, as well as the PUC and the SWE for insights into the evolution of the process.

6.4 Describe any planned market and process evaluations and how results will be used to improve programs.

There is a feedback loop among program design and implementation, impact evaluation, and process evaluation. Program design, implementation, and evaluation are elements in a cyclical feedback process. Initial program design is informed by prior baseline and market potential studies. Ongoing impact evaluation quantifies whether a program is meeting its goals and may raise questions related to program processes and design. Process evaluation tells the story behind how the impact was achieved and points the way toward improving program impacts by providing insight into program operations. Thus, the three elements work together to create a better, more effective program.

The Company's EM&V CSP will conduct process evaluations to identify issues that may require correction, gauge progress toward goals, and measure customer, trade ally, and vendor knowledge and satisfaction with various program features. The evaluations will help identify possible ways to improve implementation of the programs, including potential market or process barriers that could be addressed in the program design or implementation plan.

6.5 Describe strategy for coordinating with the EDC EM&V contractor and the SWE.

A representative from the Company's evaluation team, as well as the EM&V CSP, will attend formal evaluation and/or Program Evaluation Group meetings with the SWE to support development, ensure compliance with statewide EM&V directives, share ideas and suggestions regarding the approach being taken by the Company, and otherwise assist the Company in shaping and performing a prudent and effective evaluation strategy in collaboration and coordination with the SWE and other EDCs. Informal meetings and/or discussions with Company's representatives will also be arranged upon request of the SWE.

Additionally, the EM&V CSP will conduct evaluations on each program included in the Phase V Plan as approved, while coordinating efforts with the SWE to minimize duplication of work. Documentation required by the SWE to fulfill its responsibilities will be provided as requested.

The EM&V planning process will also include the SWE to incorporate where appropriate its advice and consent to enhance EM&V efforts. The EM&V CSP will facilitate ongoing communications with the SWE and the Company's representatives to ensure a high practicable level of coordination, particularly for any EM&V field activities and other time-sensitive EM&V tasks and processes.

6.6 Describe the approach to incorporating changes to codes and standards which may occur during Phase V of Act 129. (TRM Order at 12-14)

During the planning process, the Company has identified several measures with anticipated efficiency standards upgrades within the Phase V Period. These measures include

refrigerators, freezers, clothes dryers and heat pump water heaters. The modeling to calculate efficiency savings and demand reductions assumes current baseline standards until the anticipated date of the upgrade, at which time the modeling assumes the new efficiency standard as the baseline used in calculating savings. During the course of implementation, the Company's EM&V process will ensure that efficiency savings and demand reductions are calculated based on codes and standards consistent with the 2026 TRM and evaluation guidance.

7. COST RECOVERY MECHANISM

7.1 *Provide the total allowable EE&C costs based on 2% of 2006 revenue. Confirm alignment with the EDC budget limit specified in the 2025 IO Section A.2.*

The Company's Total Allowable Plan Costs pursuant to Act 129 are \$390,320,135. This amount reflects the annual amount determined by the Commission in the Phase V Implementation Order (Table 24 at page 232).

7.2 *Description of plan to fund the EE&C plan in accordance with 66 Pa. C.S. §§ 1307 and 2806.1. Plan costs include both incentives and administrative costs. Administrative costs may include capital expenditures for any equipment and facilities that may be required to implement the EE&C plan, as well as depreciation, operating and maintenance expenses, a return component based on the EDC's weighted cost of capital, and taxes. (2025 IO at 231) Demonstrate that all such costs are reasonable and prudent considering the goals of Act 129.*

Please refer to Section 4.2.3 for the budgeting process used to identify the funding for the Company's Phase V EE&C Plan programs and measures. See Section 7.4 for a complete description of the cost recovery mechanism proposed by the Company. The cost recovery mechanism will include all costs as described in Section 4.2.3, including administrative costs currently incurred by the Company in connection with the development of this Plan. The costs to design, create, and obtain Commission approval of the Company's Phase V EE&C Plan include consultant costs, outside legal fees, and other specific and common costs associated with the development and implementation of the Company's Plan consistent with Commission directives.

7.3 *Provide data tables (see Tables 10, 11, 12, 13 and 14).*

Tables 10, 11, and 12, 13 and 14 are provided in Appendix B.

7.4 *Provide and describe tariff and a Section 1307 cost recovery mechanism, in accordance with 66 Pa. C.S. § 1307, that will be specific to Phase V Program costs. Provide all calculations and supporting documentation.*

See Exhibit SRZ-1 and SRZ-2

7.4.1 FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class, and the rationale for separating or consolidating rate districts from a cost recovery standpoint.

The Company's *pro forma* tariff supplement for its proposed cost recovery mechanism ("Phase V EE&C-C Rider") is included in FE PA Statement No. 2. Consistent with Act 129, the Company's tariff will contain a Section 1307 cost recovery mechanism for the recovery of all Phase V Energy Efficiency and Conservation program costs. There is also a provision in the rider to allow for a reconciliation adjustment to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period. This component will be shown as a separate E factor (E^2) and will be in place through May 31, 2028.

Under the Company's proposal, the Phase V EE&C-C Rider would remain in effect during the Phase V Period (June 1, 2026 through May 31, 2031).²⁸ On an annual basis, to be effective June 1 of each year starting June 1, 2026, the Company will file by May 1st of the same year the following information:

- A reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs for the Phase V EE&C-C Reconciliation Period, as adjusted for removal of gross receipts tax. Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates for the period June 1, 2026 through May 31, 2027. Such reconciliations will be provided starting in Program Year 2 for rates to be effective June 1, 2027.
- Any adjustment to the forecasted Phase V EE&C-C revenues anticipated to be billed during April and May of the applicable program year, as adjusted for the removal of Gross Receipts Tax ("GRT"). Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates being proposed for the period June 1, 2026 through May 31, 2027. Such adjustments will be provided starting in Program Year 2 of Phase V.
- The Phase V EE&C budget estimate for the forthcoming Phase V EE&C-C Computational Period by rate class.
- A reconciliation adjustment for any remaining Phase IV EE&C costs that were not collected by the end of the Phase IV Period. This adjustment will only be included in the initial EE&C-C rate that will become effective on June 1, 2026, and the subsequent EE&C-C rate that will be in effect for the period June 1, 2027 through May 31, 2028. The reconciliation process is described in Section 7.6 below.

²⁸ If the Commission concludes that additional cost-effective energy efficiency and/or demand reduction can be attained post Phase V, the Company anticipates recovering any Phase V costs not recovered by the end of Phase V through a Phase VI cost recovery mechanism. Should there be no Phase VI of the Commission's EE&C Program, the Company reserves the right herein to request through a separate filing approval from the Commission to extend the Phase V EE&C-C Rider beyond the end of Phase V in order to collect any remaining Phase V costs and/or to recover any remaining costs through another surcharge mechanism.

The Company's proposed Phase V EE&C-C Rider include the corresponding rates to be charged during Program Year 1 of the Phase V Plan. The Company is requesting approval of both the rider and related rates as part of this proceeding. Worksheets demonstrating how these rates were determined are set forth in Exhibit SRZ-2, which is attached to the direct testimony of Stephanie R. Zieger (FE PA Statement No. 2).

As can be seen in the *pro forma* tariff supplement, the Phase V EE&C-C rates are expressed as a price per kWh for the residential, commercial and street lighting classes. The industrial class will be billed based upon the individual customer's Peak Load Contribution ("PLC") kW. The Phase V EE&C-C rates will be calculated and stated separately for the residential, commercial, street lighting, and industrial customer classes. The rate schedules that comprise the residential, commercial, street lighting, and industrial customer classes are identified on page 1 of the Company's Phase V EE&C-C Rider.

The Phase V EE&C-C rates to be billed to the residential, commercial, street lighting, and industrial classes consist of three principal components. The first is the EEC_C or "current cost" component; the second is the reconciliation component or "E" factor for Phase V costs; and the third is a second "E" Factor (E^2) for collection of Phase IV related costs remaining to be collected after May 31, 2026.

The EEC_C component represents the recovery of estimated costs to be incurred during the Annual Computation Period or "Computational Period," in which the Phase V EE&C-C rates will be in effect for each customer class. As shown on the second and third pages of the Company's Phase V EE&C-C Rider tariff supplements, the EEC_C component is customer class specific. The costs included in each customer class's EEC_C rate are identified as EEC_{Exp1} , EEC_{Exp2} , and EEC_{Exp3} .

- EEC_{Exp1} represents customer class specific costs that will be associated with the customer class specific EE&C programs as approved by the Commission. These costs will also include an allocated portion of any common costs, such as administrative and marketing costs, that will be incurred by the Company.
- EEC_{Exp2} represents the incremental administrative start-up costs incurred by the Company, allocated to each customer class, in connection with the development of the Company's Phase V EE&C Plan and related programs in response to the Commission's orders and guidance in its Phase V Implementation Order. These costs are incurred to design, create, and obtain Commission approval of the Company's Phase V EE&C Plan, and include, but are not limited to, consultant costs, outside legal fees, and other specific and common costs associated with the development and implementation of the Company's Phase V EE&C programs in compliance with Commission directives.
- EEC_{Exp3} represents the costs allocated to each customer class for the funding of the Commission's statewide evaluator contract. These costs are not subject to the 2% spending cap imposed by Act 129.²⁹

²⁹ Phase V Implementation Order at 235.

The E-factor component of the Company's residential, commercial, street lighting, and industrial class specific Phase V EE&C-C rates represents a reconciliation of actual Phase V EE&C program costs incurred by customer class to actual Phase V EE&C revenues billed by customer class on a monthly basis. This monthly reconciliation by specific customer class will result in either an over-collection of costs by customer class (revenues billed, excluding GRT, greater than actual costs) or an under-collection by customer class (revenues billed, excluding GRT, less than actual costs). The E-factor component will be applied on a customer class specific basis.

The second E-factor component ("E2") is a reconciliation adjustment that will be in effect through the determination of rates to be effective June 1, 2027, in order to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period. The remaining Phase IV Period costs will continue to be reconciled by customer class, at the Rate District level.

The Phase V EE&C-C Rider will include a reconciliation process that will calculate annual over-or under-collection by rate class.

All Plan costs (net-of-tax) and revenues included in the Company's EE&C revenues will be excluded from distribution base rate treatment and subject to Commission review and audit. Further, to the extent that the Company is reimbursed through the Phase V EE&C-C Rider for Company-owned property, such reimbursement will be treated as a contribution-in-aid-of-construction resulting in a net-of-tax reduction in amounts capitalized for those assets. As a result, these costs will be excluded from rate base in determining future distribution base rate case revenue requirements.

7.5 Describe how the cost recovery mechanism will ensure that measures are financed by the same customer class that will receive the direct energy and conservation benefits.

Consistent with the Phase V Implementation Order and Act 129, the Company's proposed Phase V EE&C-C Rider will permit the Company to bill annual, levelized Phase V EE&C-C rates on a per kWh or kW basis, as applicable to all residential, commercial, street lighting, and industrial customers. Throughout the Phase I, II, III, and IV Periods, the Predecessor Companies have had in place a tracking and reporting system and related processes and procedures, all of which have proven to be effective in tracking program specific costs during these earlier phases of the Commission's EE&C Program. The Company will continue to utilize this system and related processes and procedures to track customer participation in each program, such that cost allocations are done in a manner that ensures that there are no cross subsidies. The rates will be calculated specifically for each customer class to recover the costs of this plan as approved by the Commission and in compliance with 66 Pa.C.S. § 1307. Coupled with the reconciliation provisions by customer class included in the Company's proposed Phase V EE&C-C Rider, the Phase V EE&C-C rates will provide full, equitable, and timely cost recovery of actual EE&C program costs incurred by the Company for each customer class's available EE&C programs as approved by the Commission in this proceeding.

7.6 *Describe how Phase V costs will be accounted for separately from costs incurred in prior phases.*

Because the rider filings are generally filed with the Commission on May 1st of each year to be in effect on June 1st of that same year, the Phase IV costs will be reconciled in two distinct steps. The first step will reconcile the total actual recoverable Phase IV Plan expenditures incurred through March 31, 2026, to the actual Phase IV Plan revenues collected through March 31, 2026. Since the Phase IV Rider will end on May 31, 2026, the result of the Phase IV reconciliation through March 31, 2026, will appear as a separate line item in the Phase V EE&C-C Rider, which will go into effect on June 1, 2026. The second step will account for all actual Phase IV revenues and expenses that are realized after April 1, 2026, in a final reconciliation. The final over/under collection that results from this reconciliation will also be included as a separate line item in the Phase V EE&C-C rate calculation that will be effective on June 1, 2027.

8. COST EFFECTIVENESS

8.1 *Provide in table format the values contained in the Outputs tab of the Avoided Cost Calculator. Additionally, a completed copy of the Avoided Cost Calculator should be provided with the filing. FirstEnergy should prepare and submit a single avoided cost forecast for FirstEnergy PA that combines values for the four legacy EDCs. (TRC Test Order at 99-100) Discuss any sensitivities or key considerations associated with the forecast of avoided costs.*

The PA TRC Order included a companion Avoided Costs Calculator (“ACC”) tool. The ACC was provided by the SWE to develop the avoided energy and capacity costs for the PA TRC test calculations. This calculator also includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standard (“AEPS”) within the avoided energy cost calculations and avoided natural gas. The Company used the ACC to develop the Phase V forecasts of avoided costs used in the cost-effectiveness testing of the EE&C Plan and programs.³⁰

In accordance with the PA TRC Order, the Company completed the ACC for each FE PA Rate District and aggregated the results for cost-effectiveness testing of the Company’s Plan. See Exhibits ACC-Met Ed, ACC-Penelec, ACC-Penn Power, and ACC-West Penn for a complete ACC for each of the FE PA Rate District. Also see Exhibit ACC-FE PA for the weighted averaging calculation of the FE PA Rate Districts, as prescribed in the PA TRC Order at 100. ACC – FE PA also provides the weighted average FE PA avoided cost values consistent in format with the output tabs in the ACC, for both non low-income and low-income programs.

The sensitivities associated with the forecast of avoided cost depend largely on economic conditions, technological advancements, and policy decisions that could affect

³⁰ Note that the SWE issued guidance memos with direction on updates to the ACC, (August 29, 2025 PA SWE Memo Use of the Avoided Cost Calc Q and A) and September 17, 2025 SWE Guidance Memo on TRC Order Avoided Cost Calculator.”. The Company included these updates to the ACC.

fundamental assumptions as prescribed in the Commission's TRC Order. Factors such as inflation, customer demand, technological developments (e.g. as with renewable energy and storage solutions), economic downturn, etc., could have significant impacts on the actual avoided costs, particularly for avoided energy, avoided capacity, avoided AEPs costs, and DRIPE effects as assumed in the ACC model.

8.2 *Confirm the use of a 3% real discount rate and a 5% nominal discount rate. (TRC Test Order at 15)*

The Company used a 3% real discount rate in its calculations pursuant to the PA TRC Order and a 5% nominal discount rate where appropriate.

8.3 *Explain and demonstrate how the proposed plan will be cost-effective as defined by the TRC Test specified by the Commission. (TRC Test Order at 17)*

The projected savings generated and evaluated through this Plan are based upon the requirements and guidance of the PA TRM, the PA TRC Order, and other sources, which have been used in developing the key inputs to the analysis of the programs and measures proposed in this plan. See Appendix C, FE PA Table C-2 for the Measure Assumptions including other sources relied on in the Company's modelling.

The PA TRC test considers the combined effects of this Plan on both participating and non-participating customers. The sum of costs incurred by both the Company and any participating customers were used to calculate the costs. The benefits calculated in the PA TRC test include the avoided costs of supplying electricity; including avoided electric energy, avoided generation, transmission, and distribution capacity costs, price suppression effects on both energy and generation capacity (DRIPE), fossil fuel and water savings, and operations and maintenance benefits as prescribed in the PA TRC Order.

Avoided costs are calculated using the ACC tool as set forth in the PA TRC Order. The calculator developed by the SWE executes the methodology to develop avoided energy supply costs, including AEPS compliance, avoided capacity costs including generation, transmission, and distribution, and avoided natural gas for the PA TRC calculations. The energy prices were calculated by the ACC using futures prices quoted by the Intercontinental Exchange ("ICE") on August 21, 2025. Other inputs to the ACC were as provided or prescribed in the PA TRC Order.

Avoided operation and maintenance costs were included as a benefit where quantified in the PA SWE database. Additionally, any measures that produced "reasonably quantifiable" savings in fossil fuel and water were also included as a benefit, as prescribed in the PA TRM and TRC Orders.

The Company used the line loss factors as provided in Table 1-5 of the PA TRM.

The Company escalated cost projections by the 2% inflation rate and included the application of any additional escalation as directed by the Commission in the PA TRC Order.

The total benefits were then calculated using the projected measure kWh and kW net verified savings multiplied by the assumed number of measure units and the avoided capacity and energy costs. The value of the benefits per year was then discounted by taking a Net Present Value (“NPV”) over the measure lifetime using 3% real discount rate (5% nominal discount rate).

On the costs side, the PA TRC test includes the costs of the various programs incurred by the Company and the participating customers, including program administration and overhead costs (i.e., treated as a PA TRC cost regardless of whether the labor, materials, and other fees are incurred by participating customers, EDC staff, a CSP, or evaluation contractor) and incremental customer costs. The cost of kits and shipping costs, as well as directly installed equipment and labor costs are treated as incentives, as directed by the PA TRC Order, at 74. Any administrative costs incurred to support the braiding of funds are classified as incentives as directed by the Final Implementation Order at 168.

Program costs are budgeted by year, but operation and maintenance costs are based on measure life and are discounted using NPV back to the program year installed.

The Company also included estimated NTG ratios and realization rates based on previous program evaluations, consultant input or other industry experience in planning and in performing cost-effectiveness calculations on a net basis as prescribed in the PA TRC Order. NTG ratios depend on assumptions for effects from free ridership, spillover and rebound effects. Estimates for these factors are difficult to quantify and can change over time. The SWE acknowledges this in its 2011 report: “NTGRs [Net to Gross ratios] based on spillover, free ridership factors, etc. can represent oversimplifications that are highly dependent upon scale, program implementation dynamics, and technology.”³¹ Methods for measuring NTG ratios range from inexpensive surveys to more complex econometric modeling. Inherent issues with surveying such as biased and subjective responses, identifying correct respondents, etc., create uncertainty in the resulting values. While the econometric modeling may result in more accurate results, it is expensive, complex, and thus not typically performed on an annual basis. This leads to results that do not reflect any changes over time, such as economic or technological changes, participant cost, etc. The SWE further states that “[t]he challenge of interpreting the NTG studies and converting study results and observations into NTGR is a complex process riddled with uncertainty and subjective judgment.”³² Therefore in the evaluation of any TRC results that incorporate NTG ratios, the speculative nature of the ratios should be recognized.

³¹ *Net Savings: An Overview, GDS Associates, Inc., Nexant & Mondre Energy, October 19, 2011*

³² *Net Savings: An Overview, GDS Associates, Inc., Nexant, & Mondre Energy, October 19, 2011.*

The results of the PA TRC test as described above are presented in Tables 1 & 14 located in Appendix B of this Plan and are expressed as both a net present value and a benefit-cost ratio and on both a net and gross basis.

8.4 *Provide TRC data tables on a gross and net TRC basis. See Tables 14, Gross and Net versions*

See Appendix B, Tables 14, for the PA TRC test results of the Company's Plan and programs on both a gross and net TRC basis.

9. PLAN COMPLIANCE INFORMATION AND OTHER KEY ISSUES

9.1 *Plan Compliance Issues*

9.1.1 *Describe how the plan provides a variety of energy-efficiency and conservation measures and will provide the measures equitably to all classes of customers in accordance with the 2025 IO.*

As demonstrated throughout this Plan, a variety of program components and measures are being offered to each customer class, with at least one comprehensive program for the residential and non-residential customer classes. As discussed in detail in Section 1.1 the Phase V Plan includes a comprehensive portfolio of program offerings for the residential, small commercial and industrial, large commercial and industrial, and low-income sectors. The Phase V Plan includes program measures that will target all customer sectors to engage customers, provide energy efficiency education, and provide information regarding program services and opportunities upon which they can act. The Phase V Plan incorporates a variety of measures that offer a broad range of measures and services and incorporates both near-term and longer-term energy saving opportunities for customers, including single and prescriptive measures, multiple prescriptive and custom measures, direct install, and comprehensive whole building and energy management solutions. The residential, low-income and commercial and industrial programs are also designed to serve multifamily buildings. As a result, the Phase V Plan was designed to provide opportunities for all customer classes to participate in EE and PDR programs. And the Phase V Plan relies on experienced outsourced CSPs and leverages prior experiences and a variety of delivery channels that will support customer participation across all classes of customers.

Collectively, the proposed programs across all sectors cover all the major energy-consuming devices in the home, building, or business, thus increasing the opportunity for more customers to participate and benefit from one or more programs. Furthermore, the proposed programs promote and support comprehensive whole home/whole building/comprehensive solutions for both the residential and non-residential customer classes. Section 1, FE PA Table 1 presents a summary description of the programs by sector, and detailed descriptions and a listing of measures are provided in Section 3.

9.1.2 Provide a statement delineating the way the EE&C plan will achieve the requirements of the program under 66 Pa. C.S. §§ 2806.1(c) & (d).

The Phase V Plan has been developed to incorporate a comprehensive set of program components and measures and a variety of delivery channels that, based on known conditions, are designed to allow the Company to achieve the goals for energy and coincident demand reductions as set forth in the Phase V Implementation Order. The Phase V Plan also includes contracting with experienced CSPs and includes implementation flexibility including the ability to shift budgets between sectors and programs, adjust measures and adjust incentives within ranges, that combined with the Company's active oversight of the programs will allow it to make adjustments to timely react to changing market and economic conditions and other risks that arise over the Phase V Period. Taken collectively, the design of the Company's Plan improves the ability of the Company to achieve its goals within the Phase V budget. See Appendix B Tables 2 and 3 for the projected energy and demand reductions by each year and in total and Appendix B, Table 4 for Demand Savings by winter/summer, for the Phase V Plan.

9.1.3 Provide a statement delineating how the EE&C plan will achieve the low-income requirements prescribed in the 2025 IO. Additionally, describe any EDC plans to harmonize the Act 129 program delivery with low-income usage reduction programs and other external energy-efficiency, conservation, and healthy housing programs (such as the weatherization assistance program).

There are two low-income targets more fully described in the Phase V Implementation Order. The first requires the Company to obtain a minimum amount of its consumption reduction requirements from programs specifically targeted to the low-income sector or low-income participation in multifamily housing. The second low-income target requires that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG, in proportion to that sector's share of the total energy usage in the EDC's service territory.³³ FE PA Table 8 below provides the Low-Income targets established in the Phase V Implementation Order:

FE PA Table 8: Phase IV Low-Income Savings Targets

FE PA Table 8: Phase V Low-Income Savings Targets		
EDC	Proportionate Number of Measures (%)	Low Income Savings Target (MWh)
FE PA	9.33	86,913

As discussed in detail in Section 1.1 and 3.2.1, the Phase V Plan includes a comprehensive suite of program components and measures within the Low-Income Energy Efficiency

³³ 66 Pa. C.S. § 2806.1(b)(1)(i)(G)

Program and for low-income participation in multifamily housing that are collectively designed to achieve the consumption reduction requirements.

The Low-Income Energy Efficiency Program outlined in this Phase V Plan will serve a dual purpose of contributing to Act 129 goal attainment and minimizing the percentage of low-income household income that is devoted to energy costs. Basic, enhanced, and comprehensive services and education will be offered in the low-income portfolio to help low-income households to save energy and have more control over energy spending. The Low-Income Energy Efficiency Program includes a variety of program services, delivery channels, and vendors to support customer outreach and engagement, education, and participation to achieve energy savings in low-income households. The program includes direct or targeted offerings that engage customers and serve as a portal for other program offerings. The Company will also continue to coordinate the Low-Income Energy Efficiency Program with the Company's existing LIURP. LIURP has offered comprehensive energy efficiency services to eligible Pennsylvania households for years. This aspect of the Phase V Plan continues to enhance and accelerate the deployment of services to LIURP-eligible households under the Company's Phase V Plan.

Appendix B, Table 2 provides the projected savings from the Low-Income Energy Efficiency Program. Appendix C, FE PA Table 1 provides the projected savings from Multifamily program components of the Small and Large, C&I Energy Solutions programs that will both be collectively implemented with the residential Multifamily program components and targeted for low-income participation. The combined projections from the Low-Income Energy Efficiency Program and the Multifamily program components of the Small and Large, C&I Energy Solutions programs exceeds the consumption reduction requirements from the low-income sector.

The requirement that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG in proportion to that sector's share of the total energy usage in the EDC's service territory has been achieved by including measures that number at least proportional to low-income sector energy usage in the program targeted directly to low-income customers. Appendix B, Table 8 and FE PA Table 9 below lists a total of 48 measures that are provided directly or targeted to Low-Income customers through the Phase V Plan. The measures listed in Table 8 in Appendix B include a total of 135 additional non-low-income measures (without double counting measures offered in multiple sectors or measure tiers) resulting in a total of 183 measures, of which low-income represents 26%, significantly greater than the 9.33% target.

FE PA Table 9: Residential Low-Income WARM Measures

Available to Low-Income Customers
Air Sealing
Appliance Timers
Caulk
Central Air Conditioner
Clothes Washer
Dehumidifier
Door Repair or Replacement
Duct Insulation
Duct Sealing
Electric Baseboard Heater Replacement
Electric Clothes Dryer
Electric Dryer Venting Repair or Replacement
Electric Ductless Mini-Split Heat Pumps
Electric Furnace
Electric Heat Pumps
Electrical Repairs
Energy Education
Faucet Aerator – Energy Saving
Freezer Replacement
Health and Safety Measures
Heat Pump Water Heater
Heated Waterbed Mattress Replacement
HVAC System - Filter Replacement and Tune-Up
Insulation (attic, wall, floor, band joist, basement, crawl space)
LED Nightlight
LEDs
Pipe Insulation
Plumbing Repairs
Refrigerator Replacement
Roof Coating
Room Air Conditioner Cover
Room Air Conditioner Replacement
Room Thermometer
Sash locks
Shower Head – Energy Saving
Smart Power Strip
Storm Windows & Doors
Tank Temperature Set-Back
Thermostat Replacement and Repair
Thermostatic Shower Valves
Vapor Barrier
Vents (Roof, Gable, Soffit and Ridge)
Weather Stripping
Window Quilt / Tint

The Company has been harmonizing, coordinating, and leveraging its LIURP and Act 129 low-income offerings and funding, and it intends to continue those efforts during Phase V as follows:

- The Company’s Act 129 low-income direct install programs fully harmonize with the LIURP by using the same website for both programs and conducting joint outreach and marketing; and
- The Company’s LIURP contractors are engaged to complete additional projects or measures funded by the Act 129 low-income programs for income-qualifying homes.

This allows both programs to coordinate funding sources and more comprehensively serve the low-income customers' homes than would have occurred if each program worked independently.

In addition, the Company's Act 129 low-income programs further harmonize and coordinate with the LIURP offerings by:

- Referring customers whose incomes are above 150% of FPIG (and do not qualify for Act 129 low-income programs) to LIURP;
- Referring customers to LIURP to leverage LIURP funding; and
- Referring customers who do not qualify for the LIURP program to the Company's Act 129 low-income programs for service.

Harmonizing, coordinating, and leveraging both Act 129 low-income and LIURP offerings and funding allow the Company to serve the needs of its unique income-qualifying customers comprehensively and efficiently.

In addition to coordination with the LIURP offerings, the Company also coordinates on the delivery of its low-income programs with other external programs. Some examples of this coordination include the following:

- Vendors who implement low-income programs are required to use commercially reasonable efforts to coordinate program services and installations with other conservation programs such as the PA State Weatherization Assistance Program, and NGDC located within the Company's service territory.
- A Company representative participates in a Pennsylvania Weatherization Advisory Council's Coordination Committee, in which barriers to coordination of all low-income programs have been identified and are being resolved by the group.
- The Company's program website allows efficient coordination through the on-line application process by obtaining the customer's NGDC information and the customer's sign off allowing the Company to share customer information. The customer information is then automatically sent to the appropriate NGDC in an e-mail at the same time the application is received by the Company.
- Existing relationships are leveraged with the overlapping NGDCs and have agreed upon joint procedures.

The Company believes that efforts to coordinate both with the LIURP and with external programs has been successful to date, and plans to continue these efforts.

9.1.4 Describe how the EDC will ensure that no more than two percent of funds available to implement the plan shall be allocated for experimental equipment or devices. Describe any planned pilot programs in Phase V and list the key research questions and metrics that will be used to assess the viability of each pilot program.

The Phase V Plan focuses on encouraging the accelerated adoption of commercially available technologies for achieving the energy efficiency and demand response

requirements in a cost effective manner. See Table 8 in Appendix B for the measures included in the Phase V Plan and their eligibility requirements.

While the Phase V Plan includes no budgets for pilots or experimental equipment or devices, recognizing the five-year duration of Phase V, the EE&C Team plans to continue collaborating with the EPRI and may participate in research projects, demonstrations, and/or pilots on technological advancements in efficient measures that are eligible under the Phase V Plan, and within approved program budgets but at less than two percent of the total funds available to implement the plan. To ensure that the Company does not exceed this limitation, the EE&C Team will continuously monitor costs incurred for the implementation of various aspects of the Company's EE&C Plan and will ensure that no more than two percent of the funds available to implement the plan is spent on any such initiatives.

9.1.5 Describe how the plan will be competitively neutral to all distribution customers even if they are receiving supply from an EGS.

All programs are available to retail customers who receive distribution electric service from the Company regardless of that customer's source of generation service and, thus, will be offered on a non-discriminatory basis. Likewise, the Phase V EE&C-C tariff will collect the costs from like customers, thereby assuring the Phase V Plan is competitively neutral.

9.1.6 If the plan includes midstream delivery of non-residential lighting, include a description of how participating distributors will document that the replaced lighting equipment is not LED.

The Company will work with participating distributors to incorporate into the application process documentation that the customer equipment being replaced is not LED.

9.2 Other Key Issues:

9.2.1 Describe how this EE&C plan will lead to long-term, sustainable energy-efficiency savings in the EDC's service territory and in Pennsylvania.

The Company's Phase V Plan is designed to: (i) elevate customers' awareness of energy efficiency opportunities so that they become more conscious of their choices involving energy usage; and (ii) establish ongoing energy saving habits through market transformation by first providing introductory products and educational materials and then moving customers from behavioral and basic measures to more sophisticated and comprehensive energy efficiency options. In addition, many measures installed as a result of the Phase V Plan have lengthy lifetimes. The measures will save energy for years to come, bridging customers to even better and more efficient technologies as they become available over time. Thus, the EE&C Plan leads to long-term sustainable energy efficiency savings through the ongoing customer education and awareness and participation by customers.

9.2.2 Describe, by sector, how the EDC will address consumer education for its programs.

A concurrent marketing and educational campaign are essential to the success of these programs. The Company will continue to market its existing programs and measures to build awareness and interest in both the existing programs and the programs proposed under the Phase V Plan. Since the Phase V Plan leverages many of the programs currently being offered through the Phase IV Plan, and the response to many of the Phase IV programs has been positive, the Company plans to leverage and build upon the marketing and education strategy and its experience for Phase V.

Once the Commission approves the Phase V Plan, the Company will pursue educational and marketing efforts to build awareness and interest in the new or revised program offerings. Included in each program's budget is a marketing budget for promoting the offerings for each year of the Phase V Plan to ensure adequate outreach for achieving program goals. The Company's implementation CSPs will be required to develop and execute a marketing plan that will include a requirement that the CSP has educational expertise in social marketing and consumer behavior change. In addition, the Company assigns program managers to oversee the implementation of the program including customer communication and education efforts, in coordination with the Company's communications staff. This staff will be tasked with continually evaluating and, when appropriate, modifying the energy efficiency education messages and delivery strategies.

The Company and/or the implementation CSPs will develop educational materials to be distributed during customer interactions in specific programs. These materials may include promotional materials, equipment fact sheets, installation and maintenance guides, and other materials.

The Company's main program website, energysavepa.com, contains information and tools to support customer energy-efficiency strategies, including information regarding existing programs. The Company will increase the information available on its website for the Phase V Plan by posting customer educational and marketing materials developed for its Phase V programs, components and measures.

9.2.3 Describe how the EDC will provide the public with information about the results from the programs.

The Company provides reports to the Commission as part of its regular reporting responsibilities, which are then posted on the Commission's website. These reports will also be posted on the Company's website for review by the public.

10. APPENDICES

A. Approved CSP contract(s) or CSP contract terms and conditions.

The Commission approved the Company's Act 129 Conservation Service Provider ("CSP") Contracts RFP Procedure for FirstEnergy's Phase V EE&C Plan, filed with the

Commission on August 25, 2025 pursuant to the Act 129 Phase V Energy Efficiency and Conservation Program Final Implementation Order, by Secretarial Letter issued September 8, 2025 at Docket No. M-2025-3052826. The Company's proposed CSP contract for EM&V services for the Phase V Plan is being filed contemporaneously with this Plan as discussed in more detail in Section 4.3.2.

- B. Calculation methods and assumptions. Describe methods used for estimating all program costs, including administrative, marketing, and incentives costs; include key assumptions. Describe assumptions and present all calculations, data and results in a consistent format.***

**Appendix B:
PUC Tables 1-15**

Table 1: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Sector	Total Discounted Lifetime Costs (\$000)	Total Discounted Lifetime Benefits (\$000) ³	Present Value of Net ¹ Benefits (\$000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate Residential (exclusive of Low-Income) ²	\$235,421	\$255,030	\$19,609	1.1
Residential Low-Income	\$71,425	\$82,629	\$11,205	1.2
Small Commercial & Industrial	\$355,119	\$424,435	\$69,315	1.2
Large Commercial & Industrial	\$380,883	\$401,116	\$20,233	1.1
Total Portfolio	\$1,042,849	\$1,163,211	\$120,362	1.1

¹ “Net” refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

² The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

³ Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

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Table 2: Summary of Portfolio Energy Savings

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh ⁴	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh
Baseline ¹	54,975,912		54,975,912		54,975,912		54,975,912		54,975,912		54,975,912	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	55,429	491,758	67,497	517,939	59,440	495,503	57,565	424,914	52,050	405,824	291,979	2,335,938
Residential Low-Income Sub-Sector – Projected Incremental Savings ⁵	14,273	121,712	15,463	122,902	15,054	122,493	13,768	119,085	11,862	117,178	70,420	603,370
Small C&I Sector – Projected Incremental Savings	71,945	968,052	71,945	968,052	71,945	968,052	71,945	968,052	71,945	968,052	359,727	4,840,258
Large C&I Sector – Projected Incremental Savings	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	394,329	5,585,577
EE&C Plan Total – Projected Incremental Savings	220,513	2,698,637	233,771	2,726,008	225,305	2,703,163	222,144	2,629,165	214,723	2,608,169	1,116,455	13,365,142
EE&C Plan Total – Projected Cumulative Savings ⁶	220,513	2,698,637	454,283	5,424,645	679,588	8,127,808	901,732	10,756,973	1,116,455	13,365,142	1,116,455	13,365,142
EE&C Plan Total – Percentage of Target to be Met ²	20%		41%		62%		82%		102%		102%	
Estimated Phase IV Carryover Savings ³											0	
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	220,513		233,771		225,305		222,144		214,723		1,116,455	
Cumulative Percent Reduction from Baseline	0.4%		0.8%		1.2%		1.6%		2.0%		2.0%	
Commission-Identified Goal											1,097,605	

¹ As defined in the June 18, 2025 Implementation Order.

² The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

³ The Phase V Implementation Order limits energy carryover to 20% of an EDC's Phase V compliance target.

⁴ MWh saved are on a gross-verified basis.

⁵ Per the Phase V Implementation Order, the low-income savings target includes savings from programs solely directed at low-income customers or low-income-verified participants in multifamily housing programs. For the Company, this includes the Low-Income Energy Efficiency Program as well as the Multifamily component of the Commercial & Industrial Energy Solutions Programs, Small and Large, under which the Company projects savings of approximately 17,600 MWh from low-income customer participation, which combined with the Low Income Energy Efficiency Program exceeds its low-income savings target.

⁶ 1st-Year MWh-Total for the EE&C Plan Total – Projected Cumulative Savings value is the result of a formula correction

Table 2a: Summary of Portfolio Energy Savings and Spending (FirstEnergy ONLY)

FirstEnergy Rate District ²	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh ¹	Spend (\$1,000)	1st-Year MWh	Spend (\$1,000)	1st-Year MWh	Spend (\$1,000)	1st-Year MWh	Spend (\$1,000)	1st-Year MWh	Spend (\$1,000)	1st-Year MWh	Spend (\$1,000)
Met-Ed	61,708	22,349	65,475	22,064	63,111	21,982	62,266	21,461	60,179	21,479	312,739	109,335
Penelec	55,665	20,160	58,634	19,759	56,173	19,566	55,122	18,999	53,077	18,944	278,671	97,427
West Penn Power	83,271	30,158	88,489	29,819	85,494	29,779	84,416	29,096	81,723	29,168	423,393	148,020
Penn Power	19,869	7,196	21,173	7,135	20,527	7,150	20,340	7,011	19,743	7,047	101,652	35,538
FirstEnergy PA Total	220,513	79,862	233,771	78,777	225,305	78,477	222,144	76,566	214,723	76,638	1,116,455	390,320

¹ MWh saved are on a gross-verified basis.

² Annual Rate District level energy savings and spending are based on the Company's Plan projections and allocated to the Rate District level based on its most recent sales forecast dated June 2025

Table 3: Summary of Portfolio Demand Savings

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW ⁴	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
Baseline¹	9,515	9,515	9,515	9,515	9,515	9,515
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Annual Savings	10.3	12.2	11.3	10.1	8.4	52.4
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	3.1	3.2	3.2	3.0	2.7	15.3
Small C&I Sector – Projected Incremental Annual Savings	10.0	10.0	10.0	10.0	10.0	50.2
Large C&I Sector – Projected Incremental Annual Savings	10.7	10.7	10.7	10.7	10.7	53.5
Coincident Demand Reduction From EE Subtotal	34.1	36.2	35.3	33.9	31.9	171.4
Residential Load Shifting - Projected MW Savings	10.8	14.2	16.7	17.5	18.4	15.5
Small C&I Sector Load Shifting – Projected MW Savings	1.8	2.0	2.1	2.1	2.2	2.0
Large C&I Sector Load Shifting – Projected MW Savings	2.2	2.2	2.3	2.3	2.3	2.3
Daily Load Shifting Subtotal	14.9	18.5	21.0	22.0	22.8	19.8
Cumulative Projected Compliance Savings²	37.1	76.9	116.4	154.8	191.2	191.2
Cumulative EE&C Plan Total – Percentage of Target to be Met³	19%	40%	61%	81%	100%	100%
Estimated Phase IV Carryover Savings⁵						0
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	37.1	76.9	116.4	154.8	191.2	191.2
Cumulative Percent Reduction from Baseline	0.4%	0.8%	1.2%	1.6%	2.0%	2.0%
Commission-Identified Goal¹						191.0

¹ As defined in the June 18, 2025 Implementation Order.

² Cumulative totals reflect one-fifth of the expected MW savings from load shifting programs due to the average performance accounting method. EE program savings are additive across program years, while Load Shifting programs average across the Phase.

³ The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

⁴ MW saved are on a gross-verified basis.

⁵ 50% of any excess Phase IV demand reduction can be claimed as carryover.

Table 4: Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW ¹	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW
Coincident Reduction from EE - Residential	15.7	11.0	17.7	13.1	16.9	12.2	15.8	10.5	13.8	8.5	79.9	55.4
Coincident Reduction from EE - Non-Residential	24.9	16.6	24.9	16.6	24.9	16.6	24.9	16.6	24.9	16.6	124.6	82.8
Daily Load Shifting - Residential ³	9.3	12.3	11.7	16.7	13.3	20.1	13.9	21.2	14.5	22.2	12.6	18.5
Daily Load Shifting - Non-Residential	4.0	4.1	4.2	4.3	4.3	4.4	4.3	4.5	4.4	4.5	4.2	4.4
Total											221.4	161.1
Phase V Peak Demand Reduction Target											191.0	
Percentage of Goal In Season ²											116%	84%

¹ MW saved are on a gross-verified basis, and MW are at the system-level.

² The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year. The cells with the percentage of goal in each season (M12 and N12) will appear green if this condition has been met.

³ Daily load-shifting savings average across the phase, EE sums across the phase.

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%
Residential Market Rate	\$21,827	27%	\$22,696	29%	\$22,776	29%	\$20,895	27%	\$20,985	27%	\$109,179	28.0%
Residential Low-Income	\$11,044	14%	\$10,835	14%	\$10,882	14%	\$10,806	14%	\$10,526	14%	\$54,092	13.9%
Small C&I	\$23,057	29%	\$22,508	29%	\$22,528	29%	\$22,551	29%	\$22,572	29%	\$113,216	29.0%
Large C&I	\$19,121	24%	\$18,691	24%	\$18,691	24%	\$18,704	24%	\$18,713	24%	\$93,920	24.1%
Common Costs	\$4,814	6%	\$4,047	5%	\$3,601	5%	\$3,610	5%	\$3,843	5%	\$19,913	5.1%
Total Portfolio Budget ¹	\$79,862	100%	\$78,777	100%	\$78,477	100%	\$76,566	100%	\$76,638	100%	\$390,320	100%
SWE Cost ²	\$800		\$800		\$800		\$800		\$800		\$4,000	

¹ Cells with total percentages in row 11 will be green when the totals are above 99.9% and below 100.1%. All of these cells should be green once filled out to ensure correct cell values.

² Company Assumption Based on PH IV allocation of existing SWE contract

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Table 6: Program Summaries

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) ²	
Market Rate Residential Programs (exclusive of Low-Income)	Residential Energy Solutions Program	Residential	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	291,979	2,335,938	67.9	26%	36%
								0%	0%
								0%	0%
	Totals for Residential Sector				291,979	2,335,938	67.9	26%	36%
Residential Low-Income Programs	Low Income Energy Efficiency Program	Residential	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.	17	70,420	603,370	15.3	6%	8%
								0%	0%
								0%	0%
	Totals for Low-Income Sector				70,420	603,370	15.3	6%	8%

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Table 6: Program Summaries

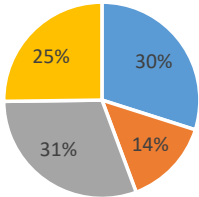
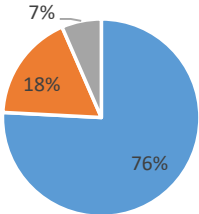
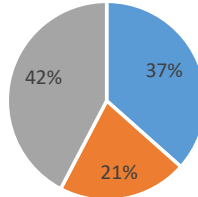
	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) ²	
Small C&I Programs	C&I Energy Solutions Program - Small	Small C&I ³	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	359,727	4,840,258	52.3	32%	27%
								0%	0%
								0%	0%
	Totals for Small C&I Sector					359,727	4,840,258	52.3	32%
Large C&I Programs	C&I Energy Solutions Program - Large	Large C&I	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	394,329	5,585,577	55.8	35%	29%
								0%	0%
								0%	0%
	Totals for Large C&I Sector					394,329	5,585,577	55.8	35%
Totals for Plan ¹					1,116,455	13,365,142	191.2	100%	100%

¹ Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

² If rows need to be added to accommodate more than 3 programs per sector, ensure total and percentage formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

³ Includes projected participation of Low Income households living in Multifamily housing.

Table 7: Budget and Parity Analysis Summary

Customer Sector	Phase V EE&C Budget (inclusive of allocated common cost)	% of Total EDC EE&C Budget	% of EDC Total Annual Revenue ¹	% of EDC Total MWh Sales
Residential Sector (<i>exclusive of Low-Income</i>)	\$116,669,242	30%	76%	37%
Residential Low Income Sub-Sector	\$56,200,111	14%		
Residential Subtotal	\$172,869,352	44%	76%	37%
Small C&I Sector	\$119,125,185	31%	18%	21%
Large C&I Sector	\$98,325,435	25%	7%	42%
Non-Residential Subtotal	\$217,450,620	56%	24%	63%
EDC TOTAL ³	\$390,319,972	100%	100%	100%
EDC TOTAL as Share of Budget Ceiling	100%			
% Budget by Customer Sector (populates when data is entered above)  - Residential Sector (exclusive of Low-Income) - Residential Low Income Sub-Sector - Small C&I Sector - Large C&I Sector % Revenue by Customer Sector  - Residential Subtotal - Small C&I Sector - Large C&I Sector % MWh Sales by Customer Sector  - Residential Subtotal - Small C&I Sector - Large C&I Sector				

1 EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total revenue should be inclusive of collections on behalf of competitive generation suppliers.

2 Budget amounts in this table should exclude SWE costs.

3 Cells F10, G10 and H10 will be green when the totals are above 99.9% and below 100.1%. All cells should be green once filled out to ensure correct subtotals.

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	Products	Freezer Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$60.00	5	\$100.00
Residential Energy Solutions Program	Products	Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$60.00	6	\$100.00
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$30.00	3	\$50.00
Residential Energy Solutions Program	Products	Dehumidifier Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$30.00	4	\$50.00
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$30.00	5	\$50.00
Residential Energy Solutions Program	Products	Cooler Recycling	1 Unit	No	No	PA TRM	\$30.00	5	\$50.00
Residential Energy Solutions Program	Products	Clothes Washer	1 Unit	No	No	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	1 Unit	No	No	ENERGY STAR or PA TRM	\$206.34	14	\$100.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	1 Unit	No	No	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	1 Unit	No	No	PA TRM	\$39.00	9	\$40.00
Residential Energy Solutions Program	Products	Room Air Conditioner	1 Unit	No	Yes	PA TRM	\$95.08	9	\$50.00
Residential Energy Solutions Program	Products	Dehumidifier	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	1 Unit	No	No	ENERGY STAR or PA TRM	\$218.07	10	\$400.00
Residential Energy Solutions Program	Products	Dishwasher	1 Unit	No	No	ENERGY STAR or PA TRM	\$79.45	10	\$75.00
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	1 Unit	No	No	ENERGY STAR or MA TRM	\$143.00	10	\$150.00
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncs	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	\$103.53	9	\$100.00
Residential Energy Solutions Program	Products	Cooler	1 Unit	No	No	ENERGY STAR or PA TRM	\$281.84	14	\$100.00
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	1 Unit	No	No	ENERGY STAR	\$242.06	14	\$200.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	Products	LED Linear	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	1 Unit	No	No	PA TRM	\$2.60	8	\$5.00
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	100 Light String	No	No	PA TRM	\$0.67	10	\$5.00
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	1 Unit	No	No	PA TRM	\$40.91	5	\$25.00
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	1 Unit	No	No	PA TRM	\$24.51	8	\$30.00
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Residential Energy Solutions Program	Products	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	\$20.80	7	\$0.20 per kWh and/or \$550 per kW saved
Residential Energy Solutions Program	Products	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	\$9,025.00	10	\$975.00
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	\$557.44	15	\$650.00
Residential Energy Solutions Program	Products	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	\$226.20	13	\$640.00
Residential Energy Solutions Program	Products	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	\$5,839.98	15	\$975.00
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	\$5,607.89	15	\$50.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	Products	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	\$552.98	10	\$350.00
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	\$6,716.86	15	\$1,500.00
Residential Energy Solutions Program	Products	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	\$13,745.19	5	\$0.20 per kWh and/or \$550 per kW saved
Residential Energy Solutions Program	Products	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
Residential Energy Solutions Program	Products	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	\$16.64	15	\$25.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$417.59	15	\$1,500.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$1,043.99	15	\$2,000.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$417.59	15	\$750.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$1,043.99	15	\$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	\$710.54	15	\$1,500.00
Residential Energy Solutions Program	HVAC & Solar	PTAC	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$521.99	15	\$500.00
Residential Energy Solutions Program	HVAC & Solar	PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$521.99	15	\$750.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	1- 3 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$18,664.80	15	\$7,500.00
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	1 Unit	No	No	PA TRM	\$196.11	5	\$150.00
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	\$103.53	9	\$100.00
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	1 - Unit	No	No	PA TRM	\$141.40	3	\$150.00
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	1-20 CFM unit	No	No	ENERGY STAR or PA TRM	\$52.42	15	\$25.00
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	1 - Unit	No	Yes	PA TRM	\$1,227.74	9	\$500.00
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$2,087.94	15	\$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	\$3,552.72	15	\$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$2,609.93	15	\$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Solar	1 kW DC Installed Capacity	No	No	PA TRM	\$1,910.63	15	\$500.00
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	1 - Audit w DI & Wgt'd Retrofits	No	Yes	In-Home Audit w/ direct install measures. Also provides incentive for program measures meeting program, PA TRM or evaluation requirements.	\$2,929.17	5	Audit - Up to \$750 for the cost of the audit with direct install measures, plus up to \$2,500 for audit recommended measures and additional incentives
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	1 kW DC Installed Capacity	No	Yes	PA TRM	\$1,910.63	15	\$500.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$730.79	15	\$2,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$730.79	15	\$1,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	\$1,915.00	10	\$1,000.00
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Up to \$250 for the cost of an audit with direct install measures
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	1-50 gal unit	No	Yes	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment	\$1,915.00	10	Same value as incentives offered through the Residential Programs.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	1 Unit	No	No	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment	\$35.72	14	Same value as incentives offered through the Commercial & Industrial Programs.
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	1 Project	No	N/A	Installation of Custom energy efficiency measures including but not limited to: lighting, HVAC, appliances, etc.	\$46,284.92	15	Same value as incentives offered through the Commercial & Industrial Programs.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	\$46,284.92	15	Same value as incentives offered through the Commercial & Industrial Programs.
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	Per HH	No	No	Residential customer meeting program requirements	\$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	Per HH	No	No	Residential customer meeting program requirements	\$0.00	2	NA

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	Per HH	No	No	Residential customer meeting program requirements	\$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	Per HH	No	No	Residential customer meeting program requirements	\$0.00	2	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	Per HH	No	No	Residential customer meeting program requirements	\$0.00	1	NA
Residential Energy Solutions Program	Behavioral	On-Line Audit	Per HH	No	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	\$0.00	1	NA
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	NC Townhouse and Duplex	No	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$2,000.00
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	NC Two on Two Cond Units	No	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	NC Single Family Detached	No	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	NC MultiFamily Low Rise	No	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	NC Mfg Housing	No	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	\$2,802.97	14	\$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	NC MultiFamily Low Rise	No	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	Vendor	No	No	Active residential customers with AMI, sufficient usage and usage history, and meets participation or other program requirements.	\$0.00	1	\$25.00
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	Vendor	No	No	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$100/enrollment + \$200/annual participation

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Residential Energy Solutions Program	DLS & DR - Res	Storage	Vendor	No	No	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$1000/enrollment + \$275/kW-year performance
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	Vendor	No	No	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$100/enrollment + \$50/annual participation
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS Summer	Vendor	No	No	Smart thermostats installed on electric cooling systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$25.00
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS Winter	Vendor	No	No	Smart thermostats installed on electric heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$25.00
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	\$0.00	-	\$0.00
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	1 Tenant Space	Yes	Yes	In-Home Audit w/ direct install measures or a welcome kit. Eligible to single family home customers.	\$172.50	13	NA
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	1-1.25 Ton Unit	Yes	Yes	Direct installation of heat pumps for water and space heating with in 5 years of being weatherized by LIURP	\$3,600.00	15	NA
Low Income Energy Efficiency Program	Weatherization	WARM Plus	Per HH	Yes	Yes	WARM Plus - Weatherization services provided to customers that qualify at or below 150% of the Federal Poverty Income Guidelines in coordination with the Low Income Usage Reduction program	\$1,275.00	13	NA
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	Per HH	Yes	Yes	WARM - Extra Measures - additional energy efficiency measures provided in coordination with the Low Income Usage Reduction program--measures above and beyond what that program provides. For customers who qualify at or below 150% of the Federal Poverty Income Guidelines	\$1,032.50	13	NA
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$60.00	5	\$125.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$60.00	6	\$125.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$30.00	3	\$75.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$30.00	4	\$75.00
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$30.00	5	\$75.00
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	1 Unit	Yes	No	PA TRM	\$30.00	5	\$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	1 Unit	-	-	PA TRM	\$39.00	9	\$40.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	1 Unit	-	-	PA TRM	\$95.08	9	\$50.00

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$79.45	10	\$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	1 Unit	-	-	ENERGY STAR	\$242.06	14	\$200.00
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	Per 4' Unit	-	-	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mrktplace) - LI	1 Unit	Yes	No	PA TRM	\$2.60	8	\$5.00
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mrktplace) - LI	100 Light String	Yes	No	PA TRM	\$0.67	10	\$5.00
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	1 Unit	Yes	No	PA TRM	\$40.91	5	\$25.00
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	1 Unit	Yes	No	PA TRM	\$24.51	8	\$30.00
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mrktplace) - LI	Per 4' Unit	Yes	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	1- 2.75 ton unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	\$1,148.37	15	\$2,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	\$1,684.76	10	\$1,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	\$1,684.76	10	\$1,000.00

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	-	Yes	No	Audit meeting IRA - HER program requirements	\$0.00	-	Multifamily buildings up to 80% audit cost if the project is likely to result in claimable significant electric savings. Other dwelling types up to \$1,500.
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	Per HH	Yes	No	#N/A	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	Per HH	Yes	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - New Homes	NC -Townhouse and duplex units - LI	NC Townhouse and Duplex	Yes	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$2,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	NC Two on Two Cond Units	Yes	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	NC Single Family Detached	Yes	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise LI	NC MultiFamily Low Rise	Yes	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	NC Mfg Housing	Yes	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	\$2,802.97	14	\$3,000.00

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	NC MultiFa mily Low Rise	Yes	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - DI - Res - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$175.00	13	Up to 100% of cost to low-income customer
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - DI - Res - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$21,518.40	14	Up to 80% of the project cost
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Prescriptive - Res - LI	1-50 gal unit	Yes	Yes	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$1,915.00	10	Up to 100% of cost to low-income customer
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Prescriptive - Res - LI	1 Unit	Yes	No	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$35.72	14	Up to 80% of the project cost
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Custom - Res - LI	1 Project	Yes	N/A	Installation of Custom energy efficiency measures including but not limited to: lighting, HVAC, appliances, etc. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$46,284.92	15	Up to 100% of the project cost
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Custom - Res - LI	1 Project	Yes	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$46,284.92	15	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$175.00	13	Up to 100% of cost to low-income customer
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	1-50 gal unit	Yes	Yes	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$1,915.00	10	Up to 100% of cost to low-income customer
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	1 Unit	Yes	No	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$35.72	14	Up to 80% of the project cost

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	1 Project	Yes	N/A	Installation of Custom energy efficiency measures including but not limited to: lighting, HVAC, appliances, etc. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$46,284.92	15	Up to 100% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	1 Project	Yes	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems. Threshold - If at least 50% of the occupants of a multifamily building have household income at or below 150% FPL, the entire building will qualify for enhanced incentives.	\$46,284.92	15	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PATRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Up to \$250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PATRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	1-50 gal unit	No	Yes	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment	\$1,915.00	10	Same value as incentives offered through the Residential Programs.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	1 Unit	No	No	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment	\$35.72	14	Same value as incentives offered through the Commercial & Industrial Programs.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	1 Project	No	N/A	Installation of Custom energy efficiency measures including but not limited to: lighting, HVAC, appliances, etc.	\$46,284.92	15	Same value as incentives offered through the Commercial & Industrial Programs.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	\$46,284.92	15	Same value as incentives offered through the Commercial & Industrial Programs.
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 <=5.4 Tn - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$2,087.94	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 >5.4 < 20 Tn - SCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	\$1,859.85	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 >=20 Tn - SCI	1- 20 ton unit	No	N/A	ENERGY STAR or PA TRM	\$709.41	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$555.71	15	500/Ton

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$31,108.00	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP - SCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$710.54	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$168.79	15	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$139.92	15	\$750.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner - SCI	1-1 ton unit	No	N/A	PA TRM	\$95.08	9	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	\$75.97	11	\$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom SCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	\$66.31	15	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	1-5 Ton Unit	No	N/A	PA TRM or evaluation guidelines	\$437.79	3	\$300.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	1 Unit	No	N/A	PA TRM	\$395.48	5	\$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	\$52.67	8	\$0.60 Per Watt Controlled
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	Per sq-ft of building lighting controlle	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	\$0.68	8	\$0.60 Per Watt Controlled

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$206.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$68.67	15	\$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$412.44	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$466.23	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$430.37	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$197.25	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzr Light - SCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$58.68	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzr Occupancy Sensor - SCI	1 Unit	No	N/A	PA TRM	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$39,799.72	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	\$198,998.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$30.53	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$243.80	14	\$0.20 per kWh and/or \$550 per kW saved

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$122.11	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt)- SCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	\$504.02	12	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$353.45	15	\$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$766.60	15	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	\$682.94	12	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	\$453.12	12	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	\$79.31	9	\$22.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls SCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	\$1,119.27	12	\$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	\$10.02	4	\$7.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$381.47	10	\$590 0-500 lbs \$980 501-1000 lbs \$1100 over 1000 lbs
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$234.30	5	\$125.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	1- unit	No	N/A	ENERGY STAR or PA TRM	\$2,537.60	12	\$150/pan
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,903.20	12	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,289.28	12	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	\$549.55	12	\$500 - full size \$375 - 3/4 size \$225 - 1/2 size
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,898.69	12	\$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	\$1,118.48	12	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,539.87	10	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	\$573.73	10	\$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	\$112.90	8	\$175.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	5	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	6	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	3	\$50.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	4	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	5	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	1 Unit	No	N/A	PA TRM	\$30.00	5	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	\$143.00	10	\$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	\$46.80	7	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	\$20.80	7	\$0.20 per kWh and/or \$550 per kW saved

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	\$9,025.00	10	\$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	\$557.44	15	\$650.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	\$226.20	13	\$640.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	\$5,839.98	15	\$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	\$5,607.89	15	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	\$552.98	10	\$350.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	\$6,716.86	15	\$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	\$13,745.19	5	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	\$16.64	15	\$25.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	\$46,284.92	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	1 kW DC Installed Capacity	No	N/A	PA TRM	\$1,928.12	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	\$4,529,325.97	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	\$149,387.80	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	\$29,997.08	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,225.00	1	\$1,500.00
C&I Energy Solutions Program - Small	Energy Management SCI	Building Tune Up - SCI	1 Project	No	N/A	Portfolio of measures and services that focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency, including the installation of energy efficiency measures.	\$37,782.88	13	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Energy Management SCI	Virtual/Meter Data Commissioning SCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	\$1,172.74	2	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Energy Management SCI	Retrocommissioning - SCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	\$5,863.72	3	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Energy Management SCI	Building Operations Training - SCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	\$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE \$1000 per person.

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Small	Energy Management SCI	Customer Concierge - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$3,500.00	1	NA
C&I Energy Solutions Program - Small	Energy Management SCI	Energy Consultation - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$1,225.00	1	NA
C&I Energy Solutions Program - Small	Energy Management SCI	Audits - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,225.00	1	\$1,500.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$100/enrollment + \$200/annual participation
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$1000/enrollment + \$275/kW-year performance
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$100/enrollment + \$50/annual participation
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$25.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	Vendor	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements. Note: Subject to the Company's ability to meet its demand reduction targets, fossil fuel backup generation is not eligible. Participation requires customer compliance with local air quality standards.	\$0.00	1	\$1000/enrollment + \$400/kW-year performance
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	-	No	No	Purchase, installation, and implementation of equipment to improve the operation and efficiency of the Company's energy delivery system.	\$0.00	-	\$0.00
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PATRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Up to \$250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PATRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	1-50 gal unit	No	Yes	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment	\$1,915.00	10	Same value as incentives offered through the Residential Programs.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	1 Unit	No	No	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment	\$35.72	14	Same value as incentives offered through the Commercial & Industrial Programs.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	1 Project	No	N/A	Installation of Custom energy efficiency measures including but not limited to: lighting, HVAC, appliances, etc.	\$46,284.92	15	Same value as incentives offered through the Commercial & Industrial Programs.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	\$46,284.92	15	Same value as incentives offered through the Commercial & Industrial Programs.
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 <=5.4 Tn - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$2,087.94	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 >5.4 < 20 Tn - LCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	\$1,859.85	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 >=20 Tn - LCI	1- 20 ton unit	No	N/A	ENERGY STAR or PA TRM	\$709.41	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$555.71	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$31,108.00	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP – LCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$710.54	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$168.79	15	\$500.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$139.92	15	\$750.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner- LCI	1-1 ton unit	No	N/A	PA TRM	\$95.08	9	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	\$75.97	11	\$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom LCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	\$66.31	15	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	1-5 Ton Unit	No	N/A	Maintenance services applicable to C&I customers for documented tune-ups of packaged and split systems up to 20 Tons (following PA TRM guidelines.)	\$437.79	3	\$300.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	1 Unit	No	N/A	PA TRM	\$395.48	5	\$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	\$52.67	8	\$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	Per sq-ft of building lighting controller	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	\$0.68	8	\$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$206.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$68.67	15	\$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$412.44	14	\$0.20 per kWh and/or \$550 per kW saved

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$466.23	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$430.37	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$197.25	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzr Light - LCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$58.68	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzr Occupancy Sensor - LCI	1 Unit	No	N/A	PA TRM	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$39,799.72	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	\$198,998.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$30.53	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$243.80	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$122.11	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS- LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and fixture controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	\$504.02	12	\$50.00

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$353.45	15	\$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$766.60	15	\$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	\$682.94	12	\$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	\$453.12	12	\$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	\$79.31	9	\$22.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	\$1,119.27	12	\$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	\$10.02	4	\$7.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$381.47	10	\$590 0-500 lbs \$980 501-1000 lbs \$1100 over 1000 lbs
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$234.30	5	\$125.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	1- unit	No	N/A	ENERGY STAR or PA TRM	\$2,537.60	12	\$150/pan
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,903.20	12	\$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,289.28	12	\$500.00

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	\$549.55	12	\$500 - full size \$375 - 3/4 size \$225 - 1/2 size
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,898.69	12	\$1,500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	\$1,118.48	12	\$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,539.87	10	\$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	\$573.73	10	\$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	\$112.90	8	\$175.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	5	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	6	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	3	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	4	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	5	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	1 Unit	No	N/A	PA TRM	\$30.00	5	\$50.00

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	\$143.00	10	\$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	\$46.80	7	\$200.00
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	\$47,090.03	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	\$91,959.50	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	1 kW DC Installed Capacity	No	N/A	PA TRM	\$1,928.12	15	\$0.20 per kWh and/or \$550 per kW saved

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	\$4,529,325.97	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems. Including a focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency	\$149,387.80	15	\$0.20 per kWh and/or \$550 per kW saved and/or Up to 80% of the project cost
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	\$29,997.08	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,225.00	1	\$1,500.00
C&I Energy Solutions Program - Large	Energy Management LCI	Virtual/Meter Data Commissioning - LCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	\$1,172.74	2	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Energy Management LCI	Retrocommissioning - LCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	\$58,637.21	3	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Energy Management LCI	Building Operations Training - LCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	\$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE \$1000 per person.
C&I Energy Solutions Program - Large	Energy Management LCI	Customer Concierge - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$3,500.00	1	NA
C&I Energy Solutions Program - Large	Energy Management LCI	Energy Consultation - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$1,750.00	1	NA
C&I Energy Solutions Program - Large	Energy Management LCI	Audits - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,750.00	1	\$1,500.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$100/enrollment + \$200/annual participation
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$1000/enrollment + \$275/kW-year performance

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Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements ⁴	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) ⁵
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	-	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements. Note: Subject to the Company's ability to meet its demand reduction targets, fossil fuel backup generation is not eligible. Participation requires customer compliance with local air quality standards.	\$0.00	1	\$1000/enrollment + \$400/kW-year performance
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	-	No	No	Purchase, installation, and implementation of equipment to improve the operation and efficiency of the Company's energy delivery system.	\$0.00	-	\$0.00

1 Indicate whether the measure counts towards the "proportionate number of measures" requirement.

2 Indicate whether the measure will be part of comprehensive measure reporting.

3 For Comprehensive Measures, see 'Table 8 Addendum' tab for a designation of measures by TRM number

4 Measure eligibility may change during the term of the plan to address market uncertainty and changes and or where supported by evaluation.

5 All values listed are "Up to Values". The Company may provide tiered, blocked, prescriptive, and/or performance-based incentives that are within the amounts listed based on varying measure characteristics, market conditions, or other factors.

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Freezer Recycling	2.4.3	Energy Savings (MWh) ²	1,514.51	1,514.51	1,514.51	1,514.51	1,514.51	7,572.56
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	0.92
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	0.66
		Projected Participation ³	2,000	2,000	2,000	2,000	2,000	10,000
Refrigerator Recycling	2.4.3	Energy Savings (MWh)	3,786.81	3,786.81	3,786.81	3,786.81	3,786.81	18,934.06
		Summer Demand Reduction (MW)	0.56	0.56	0.56	0.56	0.56	2.81
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	2.10
		Projected Participation	5,000	5,000	5,000	5,000	5,000	25,000
Room Air Conditioner Recycling	2.2.8	Energy Savings (MWh)	765.21	765.21	765.21	765.21	765.21	3,826.04
		Summer Demand Reduction (MW)	2.08	2.08	2.08	2.08	2.08	10.40
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	7,250	7,250	7,250	7,250	7,250	36,250
Dehumidifier Recycling	2.4.12	Energy Savings (MWh)	3,561.93	3,561.93	3,561.93	3,561.93	3,561.93	17,809.63
		Summer Demand Reduction (MW)	1.38	1.38	1.38	1.38	1.38	6.88
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	7,250	7,250	7,250	7,250	7,250	36,250
LV Refrigerator Recycling	2.4.4	Energy Savings (MWh)	78.45	78.45	78.45	78.45	78.45	392.25
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	200	200	200	200	200	1,000
Cooler Recycling	2.4.6	Energy Savings (MWh)	5.20	5.20	5.20	5.20	5.20	26.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	50	50	250
Clothes Washer	2.4.8	Energy Savings (MWh)	195.55	195.55	195.55	195.55	195.55	977.76
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.16
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.16
		Projected Participation	1,750	1,750	1,750	1,750	1,750	8,750
Refrigerator - PY18 to PY20	2.4.1	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	112.72
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	500	500	500	0	0	1,500
Refrigerator - PY21 & PY22	2.4.1	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	0.08
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	5	5	10
Freezer - PY18 to PY20	2.4.2	Energy Savings (MWh)	2.03	2.03	2.03	0.00	0.00	6.09
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	0	0	150
Freezer - PY21 & PY22	2.4.2	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	0.10
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	5	5	10
Clothes Dryer - PY18 & PY19	2.4.9	Energy Savings (MWh)	37.18	37.18	0.00	0.00	0.00	74.36
		Summer Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	0.01
		Projected Participation	500	500	0	0	0	1,000

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Clothes Dryer - PY20 to PY22	2.4.9	Energy Savings (MWh)	0.00	0.00	16.68	16.68	16.68	50.03
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	0	0	500	500	500	1,500
Air Purifier / Cleaner	2.4.14	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	1,287.05
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.16
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.21
		Projected Participation	1,500	1,500	1,500	1,500	1,500	7,500
Room Air Conditioner	2.2.7	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	216.48
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.40
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3,300	3,300	3,300	3,300	3,300	16,500
Dehumidifier	2.4.11	Energy Savings (MWh)	73.93	73.93	73.93	73.93	73.93	369.66
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	500	500	500	500	500	2,500
Heat Pump Water Heater - PY18 to PY20	2.3.1	Energy Savings (MWh)	9,310.57	9,310.57	9,310.57	0.00	0.00	27,931.70
		Summer Demand Reduction (MW)	1.08	1.08	1.08	0.00	0.00	3.23
		Winter Demand Reduction (MW)	1.79	1.79	1.79	0.00	0.00	5.38
		Projected Participation	4,750	4,750	4,750	0	0	14,250
Heat Pump Water Heater - PY21 & PY22	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	11.55	11.55	23.10
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	50	50	100
Pool Pump Variable Speed	2.8.1 & 2.8.2	Energy Savings (MWh)	5.50	5.50	5.50	5.50	5.50	27.48
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	50	50	250
Dishwasher	2.4.10	Energy Savings (MWh)	98.34	98.34	98.34	98.34	98.34	491.69
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.14
		Projected Participation	2,000	2,000	2,000	2,000	2,000	10,000
EV Charging Cord - Level 2 - Res	MA TRM V11	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	0.55
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Smart Thermostat - Aplncs	2.2.12	Energy Savings (MWh)	1,686.00	1,686.00	1,686.00	1,686.00	1,686.00	8,430.00
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	1.69
		Winter Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	0.71
		Projected Participation	8,000	8,000	8,000	8,000	8,000	40,000
Cooler	2.4.5	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	0.23
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Clothes Washer/Dryer Combo	2.4.8 & 2.4.9	Energy Savings (MWh)	21.76	21.76	21.76	21.76	21.76	108.82
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	150	150	150	150	150	750

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
LED Linear	2.1.1	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	506.58
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Projected Participation	5,000	5,000	5,000	5,000	5,000	25,000
LED Nightlights (Mrktplace)	2.1.3	Energy Savings (MWh)	107.14	107.14	107.14	107.14	107.14	535.71
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	7,500	7,500	7,500	7,500	7,500	37,500
Holiday Lights (Mrktplace)	2.1.4	Energy Savings (MWh)	132.00	132.00	132.00	132.00	132.00	660.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10,000	10,000	10,000	10,000	10,000	50,000
Smart Strip Plug Outlet	2.5.1	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	1,559.26
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.20
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.25
		Projected Participation	2,750	2,750	2,750	2,750	2,750	13,750
Residential Occupancy Sensor	2.1.2	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	101.62
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000
LED Linear (Mrktplace)	2.1.1	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	506.58
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Projected Participation	5,000	5,000	5,000	5,000	5,000	25,000
Agricultural Process Lighting	3.1.7	Energy Savings (MWh)	0.04	0.04	0.04	0.04	0.04	0.18
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Auto Milker Takeoff	4.1.1	Energy Savings (MWh)	1.94	1.94	1.94	1.94	1.94	9.69
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Dairy Scroll Compressor	4.1.2	Energy Savings (MWh)	0.80	0.80	0.80	0.80	0.80	3.99
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
HE Ventilation Fans	4.1.3	Energy Savings (MWh)	3.28	3.28	3.28	3.28	3.28	16.39
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Heat Reclaimer	4.1.4	Energy Savings (MWh)	5.06	5.06	5.06	5.06	5.06	25.28
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
High Volume Low Speed Fan	4.1.5	Energy Savings (MWh)	43.00	43.00	43.00	43.00	43.00	215.00
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Livestock Waterer	4.1.6	Energy Savings (MWh)	1.00	1.00	1.00	1.00	1.00	5.02
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Dairy Vac Pump VSD Control	4.1.7	Energy Savings (MWh)	10.08	10.08	10.08	10.08	10.08	50.38
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	1	1	1	1	1	5
Low Pressure Irrigation	4.1.8	Energy Savings (MWh)	12.98	12.98	12.98	12.98	12.98	64.92
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.18
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Custom - Agricultural	1.17	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Projected Participation	1	1	1	1	1	5
Engine Block Heater Timer	3.11.2	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	3.69
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Heat Pump - Eff	2.2.1 & 2.2.2	Energy Savings (MWh)	141.64	141.64	141.64	141.64	141.64	708.19
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.10
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.14
		Projected Participation	250	250	250	250	250	1,250
Heat Pump - Most Eff	2.2.1 & 2.2.2	Energy Savings (MWh)	36.68	36.68	36.68	36.68	36.68	183.39
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	25	25	25	25	25	125
Central Air Conditioner - Eff	2.2.1 & 2.2.2	Energy Savings (MWh)	88.91	88.91	88.91	88.91	88.91	444.55
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.22
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	300	300	300	300	300	1,500
Central Air Conditioner - Most Eff	2.2.1 & 2.2.2	Energy Savings (MWh)	5.96	5.96	5.96	5.96	5.96	29.78
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Ductless Mini-Split Heat Pump	2.2.1 & 2.2.2	Energy Savings (MWh)	127.82	127.82	127.82	127.82	127.82	639.09
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Projected Participation	125	125	125	125	125	625

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
PTAC	2.2.1 & 2.2.2	Energy Savings (MWh)	8.67	8.67	8.67	8.67	8.67	43.34
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	50	50	250
PTHP	2.2.1 & 2.2.2	Energy Savings (MWh)	17.62	17.62	17.62	17.62	17.62	88.10
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	80	80	80	80	80	400
Heat Pump - Water & GeoT	2.2.1 & 2.2.2	Energy Savings (MWh)	83.39	83.39	83.39	83.39	83.39	416.93
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.16
		Projected Participation	55	55	55	55	55	275
Furnace Fan (Retrofit or New to ECM)	2.2.4	Energy Savings (MWh)	4.89	4.89	4.89	4.89	4.89	24.44
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	25	25	25	25	25	125
Smart Thermostat - HVAC	2.2.12	Energy Savings (MWh)	7.94	7.94	7.94	7.94	7.94	39.71
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	25	25	25	25	25	125
AC or HP Maintenance	2.2.6	Energy Savings (MWh)	101.99	101.99	101.99	101.99	101.99	509.96
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.22
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	800	800	800	800	800	4,000
HE Bathroom Fans	2.2.14	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	0.60
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Window Heat Pump	2.2.9	Energy Savings (MWh)	39.94	39.94	39.94	39.94	39.94	199.69
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.40
		Projected Participation	100	100	100	100	100	500
REH to Heat Pump	2.2.1 & 2.2.2	Energy Savings (MWh)	3,214.59	3,214.59	3,214.59	3,214.59	3,214.59	16,072.94
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.33
		Winter Demand Reduction (MW)	1.09	1.09	1.09	1.09	1.09	5.43
		Projected Participation	450	450	450	450	450	2,250
REH to DMS Heat Pump	2.2.1 & 2.2.2	Energy Savings (MWh)	2,367.20	2,367.20	2,367.20	2,367.20	2,367.20	11,835.98
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.26
		Winter Demand Reduction (MW)	0.92	0.92	0.92	0.92	0.92	4.58
		Projected Participation	600	600	600	600	600	3,000
REH to PTHP	2.2.1 & 2.2.2	Energy Savings (MWh)	89.89	89.89	89.89	89.89	89.89	449.47
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.14
		Projected Participation	25	25	25	25	25	125
Solar	2.8.3	Energy Savings (MWh)	10,107.92	10,107.92	10,107.92	10,107.92	10,107.92	50,539.60
		Summer Demand Reduction (MW)	2.62	2.62	2.62	2.62	2.62	13.08
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	1.74
		Projected Participation	8,000	8,000	8,000	8,000	8,000	40,000

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Comprehensive Audit	Actuals & 2.6	Energy Savings (MWh)	570.03	570.03	570.03	820.84	820.84	3,351.76
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.16	0.16	0.64
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.26	0.26	1.06
		Projected Participation	400	400	400	576	576	2,352
Comp Audit - Solar	2.8.3	Energy Savings (MWh)	25.27	25.27	25.27	25.27	25.27	126.35
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100
Comp Audit - Heat Pump - Eff	2.2.1 & 2.2.2	Energy Savings (MWh)	56.66	56.66	56.66	81.58	81.58	333.13
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Projected Participation	100	100	100	144	144	588
Comp Audit - CAC - Eff	2.2.1 & 2.2.2	Energy Savings (MWh)	29.64	29.64	29.64	42.68	42.68	174.27
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	100	100	100	144	144	588
Comp Audit - HPWH	2.3.1	Energy Savings (MWh)	23.10	23.10	23.10	33.26	33.26	135.83
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.01	0.01	0.03
		Projected Participation	100	100	100	144	144	588
MF - Tenant - DI - Res	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	23.34	23.34	23.34	28.27	28.27	126.56
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	200	200	200	242	242	1,084
MF - Common - DI - Res	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	95.20	95.20	95.20	115.28	115.28	516.15
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Projected Participation	8	8	8	10	10	43
MF - Tenant - Prescriptive - Res	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Prescriptive - Res	2.4.8	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Tenant - Custom - Res	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Custom - Res	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
<i>Behavioral Ph5 Yr 1</i>	<i>CSP & 2.7.3</i>	Energy Savings (MWh)	11,454.13	0.00	0.00	0.00	0.00	11,454.13
		Summer Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	2.33
		Winter Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	2.33
		Projected Participation	368,300	0	0	0	0	368,300
<i>Behavioral Ph5 Yr 2</i>	<i>CSP & 2.7.3</i>	Energy Savings (MWh)	0.00	23,522.19	0.00	0.00	0.00	23,522.19
		Summer Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	4.31
		Winter Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	4.31
		Projected Participation	0	426,900	0	0	0	426,900
<i>Behavioral Ph5 Yr 3</i>	<i>CSP & 2.7.3</i>	Energy Savings (MWh)	0.00	0.00	15,485.94	0.00	0.00	15,485.94
		Summer Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	3.42
		Winter Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	3.42
		Projected Participation	0	0	341,100	0	0	341,100
<i>Behavioral Ph5 Yr 4</i>	<i>CSP & 2.7.3</i>	Energy Savings (MWh)	0.00	0.00	0.00	22,625.28	0.00	22,625.28
		Summer Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	3.58
		Winter Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	3.58
		Projected Participation	0	0	0	392,800	0	392,800
<i>Behavioral Ph5 Yr 5</i>	<i>CSP & 2.7.3</i>	Energy Savings (MWh)	0.00	0.00	0.00	0.00	17,110.56	17,110.56
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.85	1.85
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.85	1.85
		Projected Participation	0	0	0	0	365,610	365,610
<i>On-Line Audit</i>	<i>CSP & 2.7.3</i>	Energy Savings (MWh)	360.00	360.00	360.00	360.00	360.00	1,800.00
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.11
		Projected Participation	2,400	2,400	2,400	2,400	2,400	12,000
<i>NC -Townhouse and duplex units</i>	<i>2.7.1</i>	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	923.03
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.19
		Projected Participation	120	120	120	120	120	600
<i>NC - Two-on-Two condominium units</i>	<i>2.7.1</i>	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	923.03
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.19
		Projected Participation	120	120	120	120	120	600
<i>NC - Single-family detached units</i>	<i>2.7.1</i>	Energy Savings (MWh)	2,840.09	2,840.09	2,840.09	2,840.09	2,840.09	14,200.43
		Summer Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	1.83
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	2.86
		Projected Participation	1,200	1,200	1,200	1,200	1,200	6,000
<i>NC - Multi Family Low Rise</i>	<i>2.7.1</i>	Energy Savings (MWh)	397.61	397.61	397.61	397.61	397.61	1,988.06
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.26
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.40
		Projected Participation	280	280	280	280	280	1,400
<i>NC - Manufactured Housing</i>	<i>2.7.1</i>	Energy Savings (MWh)	304.84	304.84	304.84	304.84	304.84	1,524.18
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.20
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	0.31
		Projected Participation	184	184	184	184	184	920
<i>NC - Multi Family High Rise</i>	<i>2.7.1</i>	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Behavioral DLS & DR	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	35.79
		Winter Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	35.79
		Projected Participation	600,000	600,000	600,000	600,000	600,000	3,000,000
Managed Charging	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	3.34
		Winter Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	3.34
		Projected Participation	2,250	2,500	3,000	3,500	4,000	15,250
Storage	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	1.03	1.16	1.29	1.41	1.54	6.43
		Winter Demand Reduction (MW)	2.06	2.31	2.57	2.83	3.09	12.86
		Projected Participation	400	450	500	550	600	2,500
Thermostat DR	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	1.32	1.93	2.17	2.41	7.83
		Winter Demand Reduction (MW)	0.00	2.29	3.33	3.74	4.16	13.52
		Projected Participation	0	5,500	8,000	9,000	10,000	32,500
Thermostat DLS-Summer	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.66	1.56	2.25	2.42	2.51	9.39
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3,800	9,000	13,000	14,000	14,500	54,300
Thermostat DLS-Winter	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	2.61	4.35	6.38	6.67	6.96	26.97
		Projected Participation	4,500	7,500	11,000	11,500	12,000	46,500
Front of Meter Measures - Res	1.17	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Customer Engagement - LI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	837.95	837.95	837.95	837.95	837.95	4,189.77
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.54
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	0.67
		Projected Participation	8,000	8,000	8,000	8,000	8,000	40,000
LIURP Lookback - LI	2.2.1 & 2.2.2	Energy Savings (MWh)	431.49	431.49	431.49	431.49	431.49	2,157.45
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Winter Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	0.68
		Projected Participation	120	120	120	120	120	600
WARM Plus	Res Vol 2	Energy Savings (MWh)	2,283.07	2,283.07	2,283.07	2,283.07	2,283.07	11,415.37
		Summer Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	1.22
		Winter Demand Reduction (MW)	0.45	0.45	0.45	0.45	0.45	2.25
		Projected Participation	1,830	1,830	1,830	1,830	1,830	9,150
WARM Extra Measures	Res Vol 2	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	5,000.00
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.55
		Winter Demand Reduction (MW)	0.22	0.22	0.22	0.22	0.22	1.09
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Freezer Recycling - LI	2.4.3	Energy Savings (MWh)	302.90	302.90	302.90	302.90	302.90	1,514.51
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.18
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Projected Participation	400	400	400	400	400	2,000
Refrigerator Recycling - LI	2.4.3	Energy Savings (MWh)	757.36	757.36	757.36	757.36	757.36	3,786.81
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.56
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.42
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000
Room Air Conditioner Recycling - LI	2.2.8	Energy Savings (MWh)	395.80	395.80	395.80	395.80	395.80	1,978.99
		Summer Demand Reduction (MW)	1.08	1.08	1.08	1.08	1.08	5.38
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3,750	3,750	3,750	3,750	3,750	18,750
Dehumidifier Recycling - LI	2.4.12	Energy Savings (MWh)	1,842.38	1,842.38	1,842.38	1,842.38	1,842.38	9,211.88
		Summer Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	3.56
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3,750	3,750	3,750	3,750	3,750	18,750
LV Refrigerator Recycling - LI	2.4.4	Energy Savings (MWh)	11.77	11.77	11.77	11.77	11.77	58.84
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	30	30	30	30	30	150
Cooler Recycling - LI	2.4.6	Energy Savings (MWh)	1.04	1.04	1.04	1.04	1.04	5.20
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Clothes Washer - LI	2.4.8	Energy Savings (MWh)	335.23	335.23	335.23	335.23	335.23	1,676.16
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.27
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.27
		Projected Participation	3,000	3,000	3,000	3,000	3,000	15,000
Refrigerator - PY18 to PY20 - LI	2.4.1	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	112.72
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	500	500	500	0	0	1,500
Refrigerator - PY21 & PY22 - LI	2.4.1	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	0.08
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	5	5	10
Freezer - PY18 to PY20 - LI	2.4.2	Energy Savings (MWh)	10.15	10.15	10.15	0.00	0.00	30.45
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	250	250	250	0	0	750
Freezer - PY21 & PY22 - LI	2.4.2	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	0.10
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	5	5	10
Clothes Dryer - PY18 & PY19 - LI	2.4.9	Energy Savings (MWh)	111.55	111.55	111.55	0.00	0.00	334.64
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	0.05
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	0.05
		Projected Participation	1,500	1,500	1,500	0	0	4,500

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Clothes Dryer - PY20 to PY22 - LI	2.4.9	Energy Savings (MWh)	0.00	0.00	0.00	0.17	0.17	0.33
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	5	5	10
Air Purifier / Cleaner - LI	2.4.14	Energy Savings (MWh)	193.06	193.06	193.06	193.06	193.06	965.28
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.15
		Projected Participation	1,125	1,125	1,125	1,125	1,125	5,625
Room Air Conditioner - LI	2.2.7	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	216.48
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.40
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3,300	3,300	3,300	3,300	3,300	16,500
Dehumidifier - LI	2.4.11	Energy Savings (MWh)	8.87	8.87	8.87	8.87	8.87	44.36
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	60	60	60	60	60	300
Dishwasher - LI	2.4.10	Energy Savings (MWh)	49.17	49.17	49.17	49.17	49.17	245.85
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.07
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000
Clothes Washer/Dryer Combo - LI	2.4.8 & 2.4.9	Energy Savings (MWh)	145.09	145.09	145.09	145.09	145.09	725.47
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.11
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000
LED Linear - LI	2.1.1	Energy Savings (MWh)	91.18	91.18	91.18	91.18	91.18	455.92
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Projected Participation	4,500	4,500	4,500	4,500	4,500	22,500
LED Nightlights (Mrktplace) - LI	2.1.3	Energy Savings (MWh)	42.86	42.86	42.86	42.86	42.86	214.29
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3,000	3,000	3,000	3,000	3,000	15,000
Holiday Lights (Mrktplace) - LI	2.1.4	Energy Savings (MWh)	66.00	66.00	66.00	66.00	66.00	330.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5,000	5,000	5,000	5,000	5,000	25,000
Smart Strip Plug Outlet - LI	2.5.1	Energy Savings (MWh)	233.89	233.89	233.89	233.89	233.89	1,169.45
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.15
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.19
		Projected Participation	2,063	2,063	2,063	2,063	2,063	10,313
Residential Occupancy Sensor - LI	2.1.2	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	101.62
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000
LED Linear (Mrktplace) - LI	2.1.1	Energy Savings (MWh)	91.18	91.18	91.18	91.18	91.18	455.92
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Projected Participation	4,500	4,500	4,500	4,500	4,500	22,500

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Heat Pump - HEAR	2.2.1 & 2.2.2	Energy Savings (MWh)	2.83	2.83	2.83	2.83	2.83	14.16
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Heat Pump Water Heater - PY18 to PY20 - HEAR	2.3.1	Energy Savings (MWh)	9.80	9.80	9.80	0.00	0.00	29.40
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	0	0	15
Heat Pump Water Heater - PY21 & PY22 - HEAR	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	0.23	0.23	0.46
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	1	1	2
Audit / Technical Scoping Studies	0	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Behavioral Ph5 Yr 1 - LI	CSP & 2.7.3	Energy Savings (MWh)	2,872.00	0.00	0.00	0.00	0.00	2,872.00
		Summer Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	0.37
		Winter Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	0.37
		Projected Participation	43,800	0	0	0	0	43,800
Behavioral Ph5 Yr 2 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	4,062.00	0.00	0.00	0.00	4,062.00
		Summer Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	0.45
		Winter Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	0.45
		Projected Participation	0	43,300	0	0	0	43,300
Behavioral Ph5 Yr 3 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	3,653.00	0.00	0.00	3,653.00
		Summer Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	0.48
		Winter Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	0.48
		Projected Participation	0	0	49,800	0	0	49,800
Behavioral Ph5 Yr 4 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	0.00	2,536.00	0.00	2,536.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	0.34
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	0.34
		Projected Participation	0	0	0	48,900	0	48,900
Behavioral Ph5 Yr 5 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	0.00	0.00	629.40	629.40
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.03	0.03
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.03	0.03
		Projected Participation	0	0	0	0	10,800	10,800
On-Line Audit - LI	CSP & 2.7.3	Energy Savings (MWh)	120.00	120.00	120.00	120.00	120.00	600.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	800	800	800	800	800	4,000
NC - Townhouse and duplex units - LI	2.7.1	Energy Savings (MWh)	7.69	7.69	7.69	7.69	7.69	38.46
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
NC - Two-on-Two condominium units - LI	2.7.1	Energy Savings (MWh)	4.62	4.62	4.62	4.62	4.62	23.08
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3	3	3	3	3	15

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
NC - Single-family detached units - LI	2.7.1	Energy Savings (MWh)	4.73	4.73	4.73	4.73	4.73	23.67
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
NC - Multi Family Low Rise - LI	2.7.1	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	71.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	10	10	10	10	10	50
NC - Manufactured Housing - LI	2.7.1	Energy Savings (MWh)	49.70	49.70	49.70	49.70	49.70	248.51
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Projected Participation	30	30	30	30	30	150
NC - Multi Family High Rise - LI	2.7.1	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	7.10
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Tenant - DI - Res - LI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	496.05	496.05	496.05	496.05	496.05	2,480.27
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	0.30
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.39
		Projected Participation	4,250	4,250	4,250	4,250	4,250	21,250
MF - Common - DI - Res - LI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	1,309.00	1,309.00	1,309.00	1,309.00	1,309.00	6,545.00
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	0.88
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	0.91
		Projected Participation	110	110	110	110	110	550
MF - Tenant - Prescriptive - Res - LI	2.3.1	Energy Savings (MWh)	25.41	25.41	25.41	25.41	25.41	127.05
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	110	110	110	110	110	550
MF - Common - Prescriptive - Res - LI	2.4.8	Energy Savings (MWh)	12.29	12.29	12.29	12.29	12.29	61.46
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	110	110	110	110	110	550
MF - Tenant - Custom - Res - LI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Custom - Res - LI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Tenant - DI - SCI - LI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	601.10	601.10	601.10	601.10	601.10	3,005.50
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.36
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	0.46
		Projected Participation	5,150	5,150	5,150	5,150	5,150	25,750
MF - Common - DI - SCI - LI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	2,499.00	2,499.00	2,499.00	2,499.00	2,499.00	12,495.00
		Summer Demand Reduction (MW)	0.33	0.33	0.33	0.33	0.33	1.64
		Winter Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	1.71
		Projected Participation	210	210	210	210	210	1,050

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
MF - Tenant - Prescriptive - SCI - LI	2.3.1	Energy Savings (MWh)	80.85	80.85	80.85	80.85	80.85	404.25
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Projected Participation	350	350	350	350	350	1,750
MF - Common - Prescriptive - SCI - LI	2.4.8	Energy Savings (MWh)	39.11	39.11	39.11	39.11	39.11	195.55
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	350	350	350	350	350	1,750
MF - Tenant - Custom - SCI - LI	1.17 & 3.10	Energy Savings (MWh)	200.00	200.00	200.00	200.00	200.00	1,000.00
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Projected Participation	2	2	2	2	2	10
MF - Common - Custom - SCI - LI	1.17 & 3.10	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Projected Participation	1	1	1	1	1	5
MF - Tenant - DI - SCI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	11.67	11.67	11.67	11.67	11.67	58.36
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	100	100	100	100	100	500
MF - Common - DI - SCI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	23.80	23.80	23.80	23.80	23.80	119.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	2	2	2	2	2	10
MF - Tenant - Prescriptive - SCI	2.3.1	Energy Savings (MWh)	0.23	0.23	0.23	0.23	0.23	1.16
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Common - Prescriptive - SCI	2.4.8	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	0.56
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Tenant - Custom - SCI	1.17 & 3.10	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Projected Participation	1	1	1	1	1	5
MF - Common - Custom - SCI	1.17 & 3.10	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Projected Participation	1	1	1	1	1	5

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Air Conditioning - Level 1 <=5.4 Tn - SCI	3.2.1 & 3.2.2	Energy Savings (MWh)	203.41	203.41	203.41	203.41	203.41	1,017.04
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	0.51
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	756	756	756	756	756	3,780
Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	3.2.1 & 3.2.2	Energy Savings (MWh)	1,155.34	1,155.34	1,155.34	1,155.34	1,155.34	5,776.68
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	2.89
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	820	820	820	820	820	4,100
Air Conditioning - Level 1 >=20 Tn - SCI	3.2.1 & 3.2.2	Energy Savings (MWh)	1,317.80	1,317.80	1,317.80	1,317.80	1,317.80	6,589.02
		Summer Demand Reduction (MW)	0.66	0.66	0.66	0.66	0.66	3.30
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	820	820	820	820	820	4,100
Heat Pump - Level 1 <=5.4 Tn - SCI	3.2.1 & 3.2.2	Energy Savings (MWh)	209.85	209.85	209.85	209.85	209.85	1,049.27
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.22
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.23
		Projected Participation	315	315	315	315	315	1,575
Heat Pump - Water & GeoT - SCI	3.2.4	Energy Savings (MWh)	48.00	48.00	48.00	48.00	48.00	239.99
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Projected Participation	25	25	25	25	25	125
Ductless Mini-Split HP – SCI	3.2.5 & 3.2.6	Energy Savings (MWh)	111.65	111.65	111.65	111.65	111.65	558.26
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.09
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.14
		Projected Participation	315	315	315	315	315	1,575
PTAC - SCI	3.2.1 & 3.2.2	Energy Savings (MWh)	104.69	104.69	104.69	104.69	104.69	523.45
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.26
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1,260	1,260	1,260	1,260	1,260	6,300
PTHP - SCI	3.2.1 & 3.2.2	Energy Savings (MWh)	48.68	48.68	48.68	48.68	48.68	243.39
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.07
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	315	315	315	315	315	1,575
Room Air Conditioner - SCI	3.2.9	Energy Savings (MWh)	1.50	1.50	1.50	1.50	1.50	7.49
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	63	63	63	63	63	315
Smart Thermostat - SCI	3.2.18	Energy Savings (MWh)	7.14	7.14	7.14	7.14	7.14	35.69
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	35	35	35	35	35	175
HVAC - Custom - SCI	3.2	Energy Savings (MWh)	700.00	700.00	700.00	700.00	700.00	3,500.00
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.38
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.19
		Projected Participation	7	7	7	7	7	35
Circulating Pump (Mid Strm) - SCI	3.3.5	Energy Savings (MWh)	1.97	1.97	1.97	1.97	1.97	9.86
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	7	7	7	7	7	35

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
HVAC - Maintenance - SCI	3.2.7 & 3.2.8	Energy Savings (MWh)	56.26	56.26	56.26	56.26	56.26	281.31
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.11
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	190	190	190	190	190	950
Furnace Fan (Retrofit or New to ECM) - SCI	3.3.3	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	7.08
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	7	7	7	7	7	35
Lighting Control (Daylight & Occupancy) - SCI	3.1.3	Energy Savings (MWh)	423.89	423.89	423.89	423.89	423.89	2,119.43
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.37
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	0.30
		Projected Participation	4,000	4,000	4,000	4,000	4,000	20,000
Lighting Control (Network) - SCI	3.1.3	Energy Savings (MWh)	1,854.50	1,854.50	1,854.50	1,854.50	1,854.50	9,272.49
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	1.61
		Winter Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	1.31
		Projected Participation	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	7,500,000
LED Linear - SCI	3.1.1	Energy Savings (MWh)	6,196.08	6,196.08	6,196.08	6,196.08	6,196.08	30,980.41
		Summer Demand Reduction (MW)	1.07	1.07	1.07	1.07	1.07	5.37
		Winter Demand Reduction (MW)	0.87	0.87	0.87	0.87	0.87	4.37
		Projected Participation	36,000	36,000	36,000	36,000	36,000	180,000
Exit Sign - SCI	3.1.4	Energy Savings (MWh)	0.21	0.21	0.21	0.21	0.21	1.05
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
LED Fixture External - SCI	3.1.1	Energy Savings (MWh)	0.41	0.41	0.41	0.41	0.41	2.07
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
LED Fixture Internal - SCI	3.1.1	Energy Savings (MWh)	6,853.00	6,853.00	6,853.00	6,853.00	6,853.00	34,264.98
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	5.94
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	4.83
		Projected Participation	11,700	11,700	11,700	11,700	11,700	58,500
LED Lamp Mogul Base - SCI	3.1.1	Energy Savings (MWh)	283.85	283.85	283.85	283.85	283.85	1,419.26
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.25
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.20
		Projected Participation	720	720	720	720	720	3,600
Street & Area Lighting (Customer Owned) - SCI	3.1.1	Energy Savings (MWh)	1.13	1.13	1.13	1.13	1.13	5.67
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	23
LED Reach in Refrig / Frzer Light - SCI	3.1.5	Energy Savings (MWh)	45.60	45.60	45.60	45.60	45.60	228.01
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	180	180	180	180	180	900
Reach in Refrig / Frzer Occupancy Sensor - SCI	3.5.15	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	76.32
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	200	200	200	200	200	1,000

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Lighting - Other - SCI	3.1	Energy Savings (MWh)	450.00	450.00	450.00	450.00	450.00	2,250.00
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.39
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	0.32
		Projected Participation	5	5	5	5	5	23
Lighting - Custom - SCI	1.17 & 3.1	Energy Savings (MWh)	2,250.00	2,250.00	2,250.00	2,250.00	2,250.00	11,250.01
		Summer Demand Reduction (MW)	0.39	0.39	0.39	0.39	0.39	1.95
		Winter Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	1.59
		Projected Participation	5	5	5	5	5	23
Linear Lamp - MS - SCI	3.1.6	Energy Savings (MWh)	2,320.95	2,320.95	2,320.95	2,320.95	2,320.95	11,604.77
		Summer Demand Reduction (MW)	0.51	0.51	0.51	0.51	0.51	2.55
		Winter Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	1.72
		Projected Participation	112,500	112,500	112,500	112,500	112,500	562,500
High/Low Bay Lamp - MS - SCI	3.1.6	Energy Savings (MWh)	5,404.10	5,404.10	5,404.10	5,404.10	5,404.10	27,020.49
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	5.94
		Winter Demand Reduction (MW)	0.80	0.80	0.80	0.80	0.80	4.00
		Projected Participation	18,450	18,450	18,450	18,450	18,450	92,250
LED Fixture - MS - SCI	3.1.6	Energy Savings (MWh)	1,374.00	1,374.00	1,374.00	1,374.00	1,374.00	6,870.02
		Summer Demand Reduction (MW)	0.30	0.30	0.30	0.30	0.30	1.51
		Winter Demand Reduction (MW)	0.20	0.20	0.20	0.20	0.20	1.02
		Projected Participation	16,650	16,650	16,650	16,650	16,650	83,250
Lighting Controls - MS-SCI	3.1.6	Energy Savings (MWh)	1,878.04	1,878.04	1,878.04	1,878.04	1,878.04	9,390.18
		Summer Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	2.06
		Winter Demand Reduction (MW)	0.28	0.28	0.28	0.28	0.28	1.39
		Projected Participation	31,350	31,350	31,350	31,350	31,350	156,750
Ref/Frzr - Reach In Special Doors (low/No Anti Swt)- SCI	3.5.11	Energy Savings (MWh)	4.12	4.12	4.12	4.12	4.12	20.60
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100
ECM Evap Fan Motor - SCI	3.5.2	Energy Savings (MWh)	212.62	212.62	212.62	212.62	212.62	1,063.11
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Projected Participation	150	150	150	150	150	750
Evap Fan Controls - SCI	3.5.3	Energy Savings (MWh)	61.32	61.32	61.32	61.32	61.32	306.60
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	75	75	75	75	75	375
Refrigerator - Reach In - SCI	3.5.1	Energy Savings (MWh)	16.10	16.10	16.10	16.10	16.10	80.48
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	30	30	30	30	30	150
Freezer - Reach In - SCI	3.5.1	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	116.62
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	10	10	10	10	10	50
Refrigerated Case Cover - SCI	3.5.9, 3.5.14 & 3.5.15	Energy Savings (MWh)	158.60	158.60	158.60	158.60	158.60	793.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2,000	2,000	2,000	2,000	2,000	10,000

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Anti Sweat Heater Controls - SCI	3.5.5	Energy Savings (MWh)	201.84	201.84	201.84	201.84	201.84	1,009.22
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	300	300	300	300	300	1,500
Strip Curtain - SCI	3.5.8	Energy Savings (MWh)	1.48	1.48	1.48	1.48	1.48	7.40
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	40	40	40	40	40	200
Ice Machine - SCI	3.7.1	Energy Savings (MWh)	8.55	8.55	8.55	8.55	8.55	42.77
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	20	20	20	20	20	100
Beverage Vending Machine - Controls - SCI	3.7.2	Energy Savings (MWh)	18.75	18.75	18.75	18.75	18.75	93.77
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	50	50	250
Steam Cooker - SCI	3.7.3	Energy Savings (MWh)	52.76	52.76	52.76	52.76	52.76	263.82
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	10	10	10	10	10	50
Fryer - SCI	3.7.6	Energy Savings (MWh)	11.87	11.87	11.87	11.87	11.87	59.37
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	10	10	10	10	10	50
Griddle - SCI	3.7.9	Energy Savings (MWh)	27.39	27.39	27.39	27.39	27.39	136.97
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	10	10	10	10	10	50
Hot Food Holding Cabinet - SCI	3.7.7	Energy Savings (MWh)	5.45	5.45	5.45	5.45	5.45	27.27
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Combination Oven - SCI	3.7.4	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	117.05
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Convection Oven - SCI	3.7.5	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	63.84
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Dishwasher - SCI	3.7.8	Energy Savings (MWh)	37.65	37.65	37.65	37.65	37.65	188.24
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	10	10	10	10	10	50
Induction Cooktop - SCI	3.7.10	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	0.11
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Pre-Rinse Sprayer - SCI	3.4.2	Energy Savings (MWh)	46.02	46.02	46.02	46.02	46.02	230.08
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	25	25	25	25	25	125
Freezer Recycling - SCI	2.4.3	Energy Savings (MWh)	11.36	11.36	11.36	11.36	11.36	56.79
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	15	15	15	15	15	75
Refrigerator Recycling - SCI	2.4.3	Energy Savings (MWh)	378.68	378.68	378.68	378.68	378.68	1,893.41
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	0.28
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.21
		Projected Participation	500	500	500	500	500	2,500
Room Air Conditioner Recycling - SCI	2.2.8	Energy Savings (MWh)	42.22	42.22	42.22	42.22	42.22	211.09
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.56
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	400	400	400	400	400	2,000
Dehumidifiers Recycling - SCI	2.4.12	Energy Savings (MWh)	147.39	147.39	147.39	147.39	147.39	736.95
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	0.28
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	300	300	300	300	300	1,500
LV Refrigerator Recycling - SCI	2.4.4	Energy Savings (MWh)	5.88	5.88	5.88	5.88	5.88	29.42
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	15	15	15	15	15	75
Cooler Recycling - SCI	2.4.6	Energy Savings (MWh)	1.56	1.56	1.56	1.56	1.56	7.80
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	15	15	15	15	15	75
EV Charging Cord - Level 2 - SCI	MA TRM V11	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	3.32
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	30	30	30	30	30	150
Clothes Washer - SCI	2.4.8	Energy Savings (MWh)	1.12	1.12	1.12	1.12	1.12	5.59
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Clothes Dryer - SCI	2.4.9	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	3.72
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Refrigerator - SCI	2.4.1	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	0.04
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Water Heater - Heat Pump - SCI	2.3.1	Energy Savings (MWh)	1.16	1.16	1.16	1.16	1.16	5.78
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Freezer - SCI	2.4.2	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	0.05
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Dehumidifier - SCI	2.4.11	Energy Savings (MWh)	2.96	2.96	2.96	2.96	2.96	14.79
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100
Uninterruptible Power Supply (UPS) - SCI	3.11.4	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	71.01
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Agricultural Process Lighting	3.1.7	Energy Savings (MWh)	7.28	7.28	7.28	7.28	7.28	36.42
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	200	200	200	200	200	1,000
Auto Milker Takeoff	4.1.1	Energy Savings (MWh)	19.38	19.38	19.38	19.38	19.38	96.90
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	10	10	10	10	10	50
Dairy Scroll Compressor	4.1.2	Energy Savings (MWh)	3.99	3.99	3.99	3.99	3.99	19.93
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
HE Ventilation Fans	4.1.3	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	3.28
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Heat Reclaimer	4.1.4	Energy Savings (MWh)	25.28	25.28	25.28	25.28	25.28	126.38
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	5	5	5	5	5	25
High Volume Low Speed Fan	4.1.5	Energy Savings (MWh)	86.00	86.00	86.00	86.00	86.00	430.01
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.23
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Livestock Waterer	4.1.6	Energy Savings (MWh)	10.04	10.04	10.04	10.04	10.04	50.20
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	10	10	10	10	10	50

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
<i>Dairy Vac Pump VSD Control</i>	4.1.7	Energy Savings (MWh)	50.38	50.38	50.38	50.38	50.38	251.91
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	5	5	5	5	5	25
<i>Low Pressure Irrigation</i>	4.1.8	Energy Savings (MWh)	64.92	64.92	64.92	64.92	64.92	324.62
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	0.91
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Custom - Agricultural</i>	1.17	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	250.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	1	1	1	1	1	3
<i>Engine Block Heater Timer</i>	3.11.2	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	1.84
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	3
<i>Custom - SCI</i>	1.17	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	5,000.00
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	0.51
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.35
		Projected Participation	10	10	10	10	10	50
<i>Custom - Compressed Air - SCI</i>	1.17 & 3.10	Energy Savings (MWh)	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	10,000.00
		Summer Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	1.29
		Winter Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	1.29
		Projected Participation	20	20	20	20	20	100
<i>Custom - Refrigeration - SCI</i>	1.17 & 3.5	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	5,000.00
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	0.51
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.41
		Projected Participation	10	10	10	10	10	50
<i>Custom - Solar - SCI</i>	1.17 & 3.11.6	Energy Savings (MWh)	2,302.25	2,302.25	2,302.25	2,302.25	2,302.25	11,511.25
		Summer Demand Reduction (MW)	0.61	0.61	0.61	0.61	0.61	3.06
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	0.44
		Projected Participation	2,000	2,000	2,000	2,000	2,000	10,000
<i>Custom - CHP - SCI</i>	1.17	Energy Savings (MWh)	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	25,000.00
		Summer Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	2.99
		Winter Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	2.99
		Projected Participation	1	1	1	1	1	3

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Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Custom - Bldg Improvements - SCI	1.17 & Vol 2	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	250.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	3
Custom - New Construction - SCI	1.17 & Vol 2	Energy Savings (MWh)	3,600.00	3,600.00	3,600.00	3,600.00	3,600.00	18,000.00
		Summer Demand Reduction (MW)	0.46	0.46	0.46	0.46	0.46	2.32
		Winter Demand Reduction (MW)	0.15	0.15	0.15	0.15	0.15	0.77
		Projected Participation	36	36	36	36	36	180
Custom - Audit & Education - SCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Building Tune Up - SCI	3.2, 7, 8, 17, 20 & 21, 3.4.3, 3.5.3, 4, 5, 6, 10, 12 & 16, 3.6.2	Energy Savings (MWh)	14,518.19	14,518.19	14,518.19	14,518.19	14,518.19	72,590.94
		Summer Demand Reduction (MW)	2.04	2.04	2.04	2.04	2.04	10.19
		Winter Demand Reduction (MW)	1.67	1.67	1.67	1.67	1.67	8.34
		Projected Participation	280	280	280	280	280	1,400
Virtual/Meter Data Commissioning - SCI	1.17	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	5,000.00
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	0.43
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.36
		Projected Participation	100	100	100	100	100	500
Retrocommissioning - SCI	1.17	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	250.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	5	5	5	5	5	25
Building Operations Training - SCI	3.11.5	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	12,500.00
		Summer Demand Reduction (MW)	0.36	0.36	0.36	0.36	0.36	1.79
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	0.89
		Projected Participation	50	50	50	50	50	250
Customer Concierge - SCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Energy Consultation - SCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Audits - SCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Managed Charging	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	0.16
		Winter Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	0.16
		Projected Participation	113	125	150	175	200	763

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Storage	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	0.32
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	0.64
		Projected Participation	20	23	25	28	30	126
Thermostat DR	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.10	0.13	0.14	0.16	0.53
		Winter Demand Reduction (MW)	0.00	0.10	0.13	0.14	0.16	0.53
		Projected Participation	0	300	400	450	500	1,650
Thermostat DLS	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.09	0.19	0.23	0.24	0.25	1.01
		Winter Demand Reduction (MW)	0.09	0.19	0.23	0.24	0.25	1.01
		Projected Participation	250	550	650	700	725	2,875
Custom DLS & DR - SCI	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	8.05
		Winter Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	8.05
		Projected Participation	20	20	20	20	20	100
Front of Meter Measures - SCI	1.17	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Tenant - DI - LCI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	0.58
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Common - DI - LCI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	11.90	11.90	11.90	11.90	11.90	59.50
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	1	1	1	1	1	5
MF - Tenant - Prescriptive - LCI	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Prescriptive - LCI	2.4.8	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Tenant - Custom - LCI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Custom - LCI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Air Conditioning - Level 1 <=5.4 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	2.69	2.69	2.69	2.69	2.69	13.45
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	28.18	28.18	28.18	28.18	28.18	140.89
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.07
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100
Air Conditioning - Level 1 >=20 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	32.14	32.14	32.14	32.14	32.14	160.71
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100
Heat Pump - Level 1 <=5.4 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	5.33	5.33	5.33	5.33	5.33	26.65
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	8	8	8	8	8	40
Heat Pump - Water & GeoT - LCI	3.2.4	Energy Savings (MWh)	9.60	9.60	9.60	9.60	9.60	48.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Ductless Mini-Split HP – LCI	3.2.5 & 3.2.6	Energy Savings (MWh)	1.77	1.77	1.77	1.77	1.77	8.86
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
PTAC - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	0.17	0.17	0.17	0.17	0.17	0.83
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
PTHP - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	0.31	0.31	0.31	0.31	0.31	1.55
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
Room Air Conditioner- LCI	3.2.9	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	0.24
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
Smart Thermostat - LCI	3.2.18	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	1.02
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
HVAC - Custom - LCI	3.2	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Projected Participation	1	1	1	1	1	5

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Circulating Pump (Mid Strm) - LCI	3.3.5	Energy Savings (MWh)	0.28	0.28	0.28	0.28	0.28	1.41
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
HVAC - Maintenance - LCI	3.2.7 & 3.2.8	Energy Savings (MWh)	0.59	0.59	0.59	0.59	0.59	2.96
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
Furnace Fan (Retrofit or New to ECM) - LCI	3.3.3	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	1.01
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Lighting Controls (Daylight & Occupancy) - LCI	3.1.3	Energy Savings (MWh)	529.86	529.86	529.86	529.86	529.86	2,649.28
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	0.46
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.37
		Projected Participation	5,000	5,000	5,000	5,000	5,000	25,000
Lighting Control (Network) - LCI	3.1.3	Energy Savings (MWh)	3,090.83	3,090.83	3,090.83	3,090.83	3,090.83	15,454.16
		Summer Demand Reduction (MW)	0.54	0.54	0.54	0.54	0.54	2.68
		Winter Demand Reduction (MW)	0.44	0.44	0.44	0.44	0.44	2.18
		Projected Participation	2,500,000	2,500,000	2,500,000	2,500,000	2,500,000	12,500,000
LED Linear - LCI	3.1.1	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	34,422.67
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	5.97
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	4.86
		Projected Participation	40,000	40,000	40,000	40,000	40,000	200,000
Exit Sign - LCI	3.1.4	Energy Savings (MWh)	25.23	25.23	25.23	25.23	25.23	126.14
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	120	120	120	120	120	600
LED Fixture External - LCI	3.1.1	Energy Savings (MWh)	3,315.68	3,315.68	3,315.68	3,315.68	3,315.68	16,578.40
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.54
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	2.86
		Projected Participation	8,000	8,000	8,000	8,000	8,000	40,000
LED Fixture Internal - LCI	3.1.1	Energy Savings (MWh)	7,028.71	7,028.71	7,028.71	7,028.71	7,028.71	35,143.57
		Summer Demand Reduction (MW)	1.22	1.22	1.22	1.22	1.22	6.09
		Winter Demand Reduction (MW)	0.99	0.99	0.99	0.99	0.99	4.96
		Projected Participation	12,000	12,000	12,000	12,000	12,000	60,000
LED Lamp Mogul Base - LCI	3.1.1	Energy Savings (MWh)	197.12	197.12	197.12	197.12	197.12	985.60
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.17
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.14
		Projected Participation	500	500	500	500	500	2,500
Street & Area Lighting (Customer Owned) - LCI	3.1.1	Energy Savings (MWh)	7.56	7.56	7.56	7.56	7.56	37.80
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	30	30	30	30	30	150

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
LED Reach in Refrig / Frzr Light - LCI	3.1.5	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	253.34
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	200	200	200	200	200	1,000
Reach in Refrig / Frzr Occupancy Sensor - LCI	3.5.15	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	76.32
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	200	200	200	200	200	1,000
Lighting - Other - LCI	3.1	Energy Savings (MWh)	600.00	600.00	600.00	600.00	600.00	3,000.00
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	0.52
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.42
		Projected Participation	6	6	6	6	6	30
Lighting - Custom - LCI	1.17 & 3.1	Energy Savings (MWh)	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	15,000.01
		Summer Demand Reduction (MW)	0.52	0.52	0.52	0.52	0.52	2.60
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	2.12
		Projected Participation	6	6	6	6	6	30
Linear Lamp - MS - LCI	3.1.6	Energy Savings (MWh)	1,444.15	1,444.15	1,444.15	1,444.15	1,444.15	7,220.75
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	1.59
		Winter Demand Reduction (MW)	0.21	0.21	0.21	0.21	0.21	1.07
		Projected Participation	70,000	70,000	70,000	70,000	70,000	350,000
High/Low Bay Lamp - MS - LCI	3.1.6	Energy Savings (MWh)	2,636.15	2,636.15	2,636.15	2,636.15	2,636.15	13,180.73
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	2.90
		Winter Demand Reduction (MW)	0.39	0.39	0.39	0.39	0.39	1.95
		Projected Participation	9,000	9,000	9,000	9,000	9,000	45,000
LED Fixture - MS - LCI	3.1.6	Energy Savings (MWh)	742.71	742.71	742.71	742.71	742.71	3,713.53
		Summer Demand Reduction (MW)	0.16	0.16	0.16	0.16	0.16	0.82
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.55
		Projected Participation	9,000	9,000	9,000	9,000	9,000	45,000
Lighting Controls - MS-LCI	3.1.6	Energy Savings (MWh)	1,198.11	1,198.11	1,198.11	1,198.11	1,198.11	5,990.54
		Summer Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	1.32
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	0.89
		Projected Participation	20,000	20,000	20,000	20,000	20,000	100,000
Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	3.5.11	Energy Savings (MWh)	2.06	2.06	2.06	2.06	2.06	10.30
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
ECM Evap Fan Motor - LCI	3.5.2	Energy Savings (MWh)	14.17	14.17	14.17	14.17	14.17	70.87
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	10	10	10	10	10	50
Evap Fan Controls - LCI	3.5.3	Energy Savings (MWh)	8.18	8.18	8.18	8.18	8.18	40.88
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
<i>Refrigerator - Reach In - LCI</i>	3.5.1	Energy Savings (MWh)	2.68	2.68	2.68	2.68	2.68	13.41
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Freezer - Reach In - LCI</i>	3.5.1	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	116.62
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	10	10	10	10	10	50
<i>Refrigerated Case Cover - LCI</i>	3.5.9, 3.5.14 & 3.5.15	Energy Savings (MWh)	3.96	3.96	3.96	3.96	3.96	19.82
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	50	50	250
<i>Anti Sweat Heater Control - LCI</i>	3.5.5	Energy Savings (MWh)	3.36	3.36	3.36	3.36	3.36	16.82
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Strip Curtain - LCI</i>	3.5.8	Energy Savings (MWh)	0.19	0.19	0.19	0.19	0.19	0.93
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Ice Machine - LCI</i>	3.7.1	Energy Savings (MWh)	2.14	2.14	2.14	2.14	2.14	10.69
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Beverage Vending Machine - Controls - LCI</i>	3.7.2	Energy Savings (MWh)	1.88	1.88	1.88	1.88	1.88	9.38
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Steam Cooker - LCI</i>	3.7.3	Energy Savings (MWh)	26.38	26.38	26.38	26.38	26.38	131.91
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Projected Participation	5	5	5	5	5	25
<i>Fryer - LCI</i>	3.7.6	Energy Savings (MWh)	5.94	5.94	5.94	5.94	5.94	29.69
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
<i>Griddle - LCI</i>	3.7.9	Energy Savings (MWh)	13.70	13.70	13.70	13.70	13.70	68.49
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
<i>Hot Food Holding Cabinet - LCI</i>	3.7.7	Energy Savings (MWh)	2.73	2.73	2.73	2.73	2.73	13.63
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Combination Oven - LCI	3.7.4	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	117.05
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Convection Oven - LCI	3.7.5	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	63.84
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Dishwasher - LCI	3.7.8	Energy Savings (MWh)	18.82	18.82	18.82	18.82	18.82	94.12
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
Induction Cooktop - LCI	3.7.10	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	0.11
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Pre-Rinse Sprayer - LCI	3.4.2	Energy Savings (MWh)	92.03	92.03	92.03	92.03	92.03	460.16
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.07
		Projected Participation	50	50	50	50	50	250
Freezer Recycling - LCI	2.4.3	Energy Savings (MWh)	2.27	2.27	2.27	2.27	2.27	11.36
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3	3	3	3	3	15
Refrigerator Recycling - LCI	2.4.3	Energy Savings (MWh)	104.14	104.14	104.14	104.14	104.14	520.69
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.06
		Projected Participation	138	138	138	138	138	688
Room Air Conditioner Recycling - LCI	2.2.8	Energy Savings (MWh)	2.64	2.64	2.64	2.64	2.64	13.19
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	25	25	25	25	25	125
Dehumidifiers Recycling - LCI	2.4.12	Energy Savings (MWh)	9.21	9.21	9.21	9.21	9.21	46.06
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	19	19	19	19	19	94
LV Refrigerator Recycling - LCI	2.4.4	Energy Savings (MWh)	0.98	0.98	0.98	0.98	0.98	4.90
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3	3	3	3	3	13
Cooler Recycling - LCI	2.4.6	Energy Savings (MWh)	0.26	0.26	0.26	0.26	0.26	1.30
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3	3	3	3	3	13

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
EV Charging Cord - Level 2 - LCI	MA TRM V11	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	0.11
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Clothes Washer - LCI	2.4.8	Energy Savings (MWh)	0.56	0.56	0.56	0.56	0.56	2.79
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Clothes Dryer - LCI	2.4.9	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	1.86
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Refrigerator - LCI	2.4.1	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	0.04
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Water Heater - Heat Pump - LCI	2.3.1	Energy Savings (MWh)	0.46	0.46	0.46	0.46	0.46	2.31
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
Freezer - LCI	2.4.2	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	0.05
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
Dehumidifier - LCI	2.4.11	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	3.70
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Uninterruptible Power Supply (UPS) - LCI	3.11.4	Energy Savings (MWh)	5.68	5.68	5.68	5.68	5.68	28.40
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	2	2	2	2	2	10
Custom - LCI	1.17	Energy Savings (MWh)	11,200.00	11,200.00	11,200.00	11,200.00	11,200.00	56,000.00
		Summer Demand Reduction (MW)	1.17	1.17	1.17	1.17	1.17	5.83
		Winter Demand Reduction (MW)	1.05	1.05	1.05	1.05	1.05	5.27
		Projected Participation	112	112	112	112	112	560
Custom - Compressed Air - LCI	1.17 & 3.10	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	7,000.00
		Summer Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	0.86
		Winter Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	0.86
		Projected Participation	14	14	14	14	14	70
Custom - Refrigeration - LCI	1.17 & 3.5	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	7,000.00
		Summer Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	0.71
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.57
		Projected Participation	14	14	14	14	14	70

REVISED PLAN 2/19/2026

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Custom - Solar - LCI	1.17	Energy Savings (MWh)	10,820.58	10,820.58	10,820.58	10,820.58	10,820.58	54,102.88
		Summer Demand Reduction (MW)	2.88	2.88	2.88	2.88	2.88	14.39
		Winter Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	2.05
		Projected Participation	9,400	9,400	9,400	9,400	9,400	47,000
Custom - CHP - LCI	1.17 & 3.11.6	Energy Savings (MWh)	15,000.00	15,000.00	15,000.00	15,000.00	15,000.00	75,000.00
		Summer Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	8.97
		Winter Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	8.97
		Projected Participation	2	2	2	2	2	8
Custom - Bldg Improvements - LCI	1.17 & Vol 2	Energy Savings (MWh)	6,000.00	6,000.00	6,000.00	6,000.00	6,000.00	30,000.00
		Summer Demand Reduction (MW)	0.90	0.90	0.90	0.90	0.90	4.51
		Winter Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	3.54
		Projected Participation	60	60	60	60	60	300
Custom - New Construction - LCI	1.17 & Vol 2	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	5,000.00
		Summer Demand Reduction (MW)	0.12	0.12	0.12	0.12	0.12	0.61
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.12
		Projected Participation	10	10	10	10	10	50
Custom - Audit & Education - LCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Virtual/Meter Data Commissioning - LCI	1.17	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	10	10	10	10	10	50
Retrocommissioning - LCI	1.17	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	500.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	1	1	1	1	1	5
Building Operations Training - LCI	3.11.5	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	2,500.00
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.36
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.18
		Projected Participation	10	10	10	10	10	50
Customer Concierge - LCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50

Table 9: Estimated Savings and Participation

Measure ¹	2026 TRM Measure Number ⁵	Metric	PY18	PY19	PY20	PY21	PY22	Total ⁴
Energy Consultation - LCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Audits - LCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Managed Charging	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Projected Participation	45	50	60	70	80	305
Storage	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	0.32
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	0.64
		Projected Participation	20	23	25	28	30	126
Custom DLS & DR - LCI	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	10.73
		Winter Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	10.73
		Projected Participation	10	10	10	10	10	50
Front of Meter Measures - LCI	1.17	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5

¹ Each measure should receive its own row in the table.

² Energy Savings and Demand Reduction should be aggregate (not per-unit) compliance values (not lifetime). Express MW impacts at the system-level (inclusive of line losses).

³ Projected participation should use the same basis as the units shown in Table 8.

⁴ If rows need to be added to accommodate more than 3 measures, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

⁵ The Measure Number reflects the Company's primary planning assumptions, other sections of the applicable PA TRM or other Evaluation guidance (e.g. Interim Measure Protocols) may be used to support the Company's program reporting and evaluation results.

Table 10: Budget by Program

Program Name: ¹		Residential Energy Solutions Program					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$23,558	\$24,255	\$24,149	\$22,261	\$22,446	\$116,669
Incentives (\$000) ²	Rebates	\$10,156	\$10,483	\$10,703	\$9,081	\$9,244	\$49,666
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$58	\$58	\$58	\$70	\$70	\$314
	Braided Funding Support Labor	\$412	\$378	\$378	\$299	\$299	\$1,765
	Incentive Total	\$10,626	\$10,918	\$11,139	\$9,450	\$9,613	\$51,746
Non-Incentives (\$000)	Program Design	\$382	\$169	\$167	\$166	\$167	\$1,050
	Administrative	\$1,259	\$1,390	\$1,206	\$1,200	\$1,295	\$6,350
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$9,594	\$10,145	\$10,009	\$9,866	\$9,787	\$49,401
	Marketing	\$979	\$988	\$987	\$985	\$986	\$4,925
	EM&V	\$628	\$645	\$642	\$594	\$599	\$3,107
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$90	\$0	\$0	\$0	\$0	\$90
Non-Incentive Total		\$12,932	\$13,336	\$13,011	\$12,811	\$12,833	\$64,923
Percent Incentives ³		45%	45%	46%	42%	43%	44%

¹ Each program should receive its own table. For additional programs, copy this table and change program name.

² See 2026 TRC Order definitions of incentives.

³ The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: ¹		Low Income Energy Efficiency Program					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$11,574	\$11,261	\$11,267	\$11,193	\$10,905	\$56,200
Incentives (\$000) ²	Rebates	\$816	\$816	\$816	\$759	\$759	\$3,965
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$200	\$200	\$200	\$200	\$200	\$1,000
	Direct Install Materials & Labor	\$6,017	\$6,017	\$6,017	\$6,017	\$6,017	\$30,084
	Braided Funding Support Labor	\$137	\$131	\$131	\$134	\$134	\$669
	Incentive Total	\$7,170	\$7,164	\$7,164	\$7,110	\$7,110	\$35,718
Non-Incentives (\$000)	Program Design	\$118	\$46	\$47	\$47	\$44	\$302
	Administrative	\$385	\$380	\$338	\$339	\$336	\$1,778
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$3,019	\$2,826	\$2,873	\$2,853	\$2,582	\$14,153
	Marketing	\$558	\$556	\$557	\$557	\$554	\$2,780
	EM&V	\$297	\$289	\$289	\$287	\$280	\$1,441
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$28	\$0	\$0	\$0	\$0	\$28
Non-Incentive Total		\$4,404	\$4,097	\$4,104	\$4,082	\$3,795	\$20,482
Percent Incentives ³		62%	64%	64%	64%	65%	64%

¹ Each program should receive its own table. For additional programs, copy this table and change program name.

² See 2026 TRC Order definitions of incentives.

³ The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: ¹		C&I Energy Solutions Program - Small					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$24,517	\$23,689	\$23,583	\$23,616	\$23,720	\$119,125
Incentives (\$000) ²	Rebates	\$5,241	\$5,259	\$5,269	\$5,277	\$5,285	\$26,330
	Upstream/Midstream Buydown	\$878	\$878	\$878	\$878	\$878	\$4,391
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$6,265	\$6,265	\$6,265	\$6,265	\$6,265	\$31,327
	Braided Funding Support Labor	\$347	\$320	\$320	\$324	\$324	\$1,636
	Incentive Total	\$12,732	\$12,722	\$12,732	\$12,745	\$12,753	\$63,685
Non-Incentives (\$000)	Program Design	\$322	\$128	\$128	\$129	\$131	\$837
	Administrative	\$1,062	\$1,053	\$927	\$936	\$1,017	\$4,996
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$8,250	\$7,763	\$7,778	\$7,786	\$7,793	\$39,371
	Marketing	\$738	\$734	\$735	\$735	\$737	\$3,680
	EM&V	\$1,256	\$1,214	\$1,208	\$1,210	\$1,215	\$6,103
	AEPS Registration Support	\$81	\$74	\$74	\$74	\$74	\$378
	Other (Describe)	\$76	\$0	\$0	\$0	\$0	\$76
	Non-Incentive Total	\$11,785	\$10,966	\$10,851	\$10,871	\$10,967	\$55,441
Percent Incentives ³		52%	54%	54%	54%	54%	53%

¹ Each program should receive its own table. For additional programs, copy this table and change program name.

² See 2026 TRC Order definitions of incentives.

³ The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: ¹		C&I Energy Solutions Program - Large					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$20,212	\$19,572	\$19,477	\$19,497	\$19,567	\$98,325
Incentives (\$000) ²	Rebates	\$10,548	\$10,552	\$10,555	\$10,559	\$10,562	\$52,775
	Upstream/Midstream Buydown	\$482	\$482	\$482	\$482	\$482	\$2,408
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$4	\$4	\$4	\$4	\$4	\$18
	Braided Funding Support Labor	\$287	\$276	\$276	\$283	\$283	\$1,405
	Incentive Total	\$11,321	\$11,313	\$11,316	\$11,327	\$11,330	\$56,607
Non-Incentives (\$000)	Program Design	\$240	\$95	\$95	\$96	\$97	\$623
	Administrative	\$795	\$786	\$691	\$697	\$757	\$3,726
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$6,046	\$5,664	\$5,665	\$5,666	\$5,667	\$28,706
	Marketing	\$600	\$596	\$597	\$597	\$598	\$2,987
	EM&V	\$1,036	\$1,003	\$998	\$999	\$1,002	\$5,038
	AEPS Registration Support	\$119	\$116	\$116	\$116	\$116	\$582
	Other (Describe)	\$57	\$0	\$0	\$0	\$0	\$57
Non-Incentive Total		\$8,892	\$8,259	\$8,161	\$8,170	\$8,237	\$41,719
Percent Incentives ³		56%	58%	58%	58%	58%	58%

¹ Each program should receive its own table. For additional programs, copy this table and change program name.

² See 2026 TRC Order definitions of incentives.

³ The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: ¹	Total Portfolio						
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$79,862	\$78,777	\$78,477	\$76,566	\$76,638	\$390,320
Incentives (\$000) ²	Rebates	\$26,761	\$27,108	\$27,342	\$25,676	\$25,850	\$132,737
	Upstream/Midstream Buydown	\$1,360	\$1,360	\$1,360	\$1,360	\$1,360	\$6,799
	Kits	\$200	\$200	\$200	\$200	\$200	\$1,000
	Direct Install Materials & Labor	\$12,344	\$12,344	\$12,344	\$12,356	\$12,356	\$61,744
	Braided Funding Support Labor	\$1,184	\$1,105	\$1,105	\$1,040	\$1,040	\$5,475
	Incentive Total	\$41,848	\$42,117	\$42,351	\$40,632	\$40,806	\$207,755
Non-Incentives (\$000)	Program Design	\$1,063	\$438	\$438	\$438	\$438	\$2,813
	Administrative	\$3,501	\$3,609	\$3,163	\$3,172	\$3,405	\$16,850
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$26,908	\$26,398	\$26,324	\$26,170	\$25,829	\$131,631
	Marketing	\$2,875	\$2,875	\$2,875	\$2,875	\$2,875	\$14,373
	EM&V	\$3,217	\$3,150	\$3,137	\$3,090	\$3,096	\$15,689
	AEPS Registration Support	\$200	\$190	\$190	\$190	\$190	\$960
	Other (Describe)	\$250	\$0	\$0	\$0	\$0	\$250
	Non-Incentive Total	\$38,014	\$36,659	\$36,126	\$35,934	\$35,832	\$182,565
Percent Incentives ³		52%	53%	54%	53%	53%	53%

¹ Each program should receive its own table. For additional programs, copy this table and change program name.

² See 2026 TRC Order definitions of incentives.

³ The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

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Table 11: Summary of EE&C Costs by Sector and Program

Sector	EE&C Program ¹	Cost Elements (\$) ²									Total Cost	Expected Acquisition Cost ³ (\$/MWh)	Levelized Cost ⁴ (\$/MWh)	Expected Acquisition Cost (\$/MWh)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other (Describe)				
Residential Portfolio (incl. Low-Income)	Residential Energy Solutions Program	\$51,745,816	\$0	\$0	\$0	\$49,400,920	\$4,924,907	\$3,107,281	\$0	\$0	\$109,178,923	\$373.93	\$0.11	\$1,607,523
	Low Income Energy Efficiency Program	\$35,717,699	\$0	\$0	\$0	\$14,153,077	\$2,780,363	\$1,441,169	\$0	\$0	\$54,092,308	\$768.14	\$0.14	\$3,545,273
											\$0			
											\$0			
	Sector Total ⁵	\$87,463,515	\$0	\$0	\$0	\$63,553,997	\$7,705,270	\$4,548,450	\$0	\$0	\$163,271,231	\$1,142	\$0.25	\$5,152,797
Small C&I	C&I Energy Solutions Program - Small	\$63,684,508			\$0	\$39,370,789	\$3,679,843	\$6,103,188	\$377,812		\$113,216,139	\$314.73	\$0.08	\$2,165,955
											\$0			
											\$0			
											\$0			
	Sector Total	\$63,684,508	\$0	\$0	\$0	\$39,370,789	\$3,679,843	\$6,103,188	\$377,812	\$0	\$113,216,139	\$315	\$0.08	\$2,165,955
Large C&I	C&I Energy Solutions Program - Large	\$56,606,724			\$0	\$28,706,131	\$2,987,418	\$5,037,546	\$582,283		\$93,920,101	\$238.18	\$0.07	\$1,684,332
											\$0			
											\$0			
											\$0			
	Sector Total	\$56,606,724	\$0	\$0	\$0	\$28,706,131	\$2,987,418	\$5,037,546	\$582,283	\$0	\$93,920,101	\$238	\$0.07	\$1,684,332

¹ List each EE&C program by name. Add rows as necessary, preserving formulas in totals rows.

² List all cost elements for each program that can be directly identified as relating exclusively to the specific customer sector addressed in this table. Any cost elements that are applicable to multiple sectors, or are common across all sectors, are to be listed in Table 11 (relating to Common Costs). Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

³ The numerator in the acquisition cost calculation is the full EDC cost, free of any allocation. Acquisition costs are first-year.

⁴ The levelized cost of energy is the gross TRC costs divided by the discounted lifetime MWh savings

⁵ If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 12: Allocation of Common Costs to Applicable Customer Sector

Common Cost Element ¹	Total Cost (\$)	Basis for Cost Allocation ²	Sector Cost Allocation (\$)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Program Design	\$2,812,500	Ratio of each programs specific delivery and marketing costs	\$1,352,536	\$837,214	\$622,750
Administrative	\$16,850,000	Ratio of each programs specific delivery and marketing costs	\$8,127,907	\$4,996,049	\$3,726,044
Other (Describe)	\$250,000	Ratio of each programs specific delivery and marketing costs, including external legal	\$117,678	\$75,782	\$56,540
Totals	\$19,912,500		\$9,598,121	\$5,909,046	\$4,405,334
SWE Cost ³	\$4,000,000				

¹ List all identified cost elements that are determined to be applicable to multiple customer sectors, or are common across all sectors. Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

² Provide a brief explanation of the methodology used to allocate each common cost element to the applicable customer sectors.

³ The Statewide Evaluator (SWE) costs are separate from the "2% rule" wherein EDCs have a budget ceiling that limits program spending to two percent of each EDC's 2006 annual revenue.

⁴ If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 13: Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs ¹	Total Common Costs ²	Total of All Costs
Residential (Including Low-Income)	\$163,271,231	\$9,598,121	\$172,869,352
Small C&I	\$113,216,139	\$5,909,046	\$119,125,185
Large C&I	\$93,920,101	\$4,405,334	\$98,325,435
Totals	\$370,407,472	\$19,912,500	\$390,319,972

¹ Cost figures are automatically carried over from the Sector Total rows of Table 11.

² Cost figures are automatically carried over from the bottom row ("Totals") of Table 12. Does not include SWE cost.

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Table 14: TRC Benefits Table (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Solutions Program	PY18	1.0	1.08	\$9,924.93	\$24,300.69	\$12,932.20	\$47,157.82	\$16,798.62	\$31,913.05	\$2,468.00	-\$324.89	\$50,854.77
	PY19	1.0	1.09	\$9,891.39	\$26,632.73	\$13,336.37	\$49,860.48	\$17,488.79	\$34,915.60	\$2,517.52	-\$324.89	\$54,597.01
	PY20	1.0	1.05	\$9,881.16	\$28,175.28	\$13,010.55	\$51,066.99	\$17,737.62	\$33,591.91	\$2,580.37	-\$324.89	\$53,585.02
	PY21	1.0	1.12	\$8,040.14	\$22,805.71	\$12,810.90	\$43,656.76	\$16,752.56	\$29,628.43	\$2,654.74	-\$324.89	\$48,710.84
	PY22	1.0	1.08	\$8,040.14	\$22,805.71	\$12,833.40	\$43,679.26	\$16,474.72	\$28,400.64	\$2,732.23	-\$324.89	\$47,282.70
Residential Energy Solutions Program Total		1.00	1.08	\$45,777.76	\$124,720.12	\$64,923.43	\$235,421.31	\$85,252.31	\$158,449.63	\$12,952.86	-\$1,624.45	\$255,030.34
Low Income Energy Efficiency Program	PY18	1.0	1.09	\$7,054.17	\$3,260.36	\$4,404.31	\$14,718.84	\$3,427.21	\$9,946.80	\$2,696.58	\$0.00	\$16,070.59
	PY19	1.0	1.14	\$7,050.69	\$3,263.84	\$4,097.17	\$14,411.69	\$3,375.52	\$10,275.20	\$2,750.42	\$0.00	\$16,401.14
	PY20	1.0	1.16	\$7,050.70	\$3,263.83	\$4,103.56	\$14,418.09	\$3,482.42	\$10,431.99	\$2,805.44	\$0.00	\$16,719.85
	PY21	1.0	1.18	\$7,009.04	\$2,990.27	\$4,082.37	\$14,081.68	\$3,490.35	\$10,333.72	\$2,861.70	\$0.00	\$16,685.76
	PY22	1.0	1.21	\$7,009.04	\$2,990.27	\$3,795.00	\$13,794.31	\$3,500.97	\$10,331.81	\$2,919.22	\$0.00	\$16,752.00
Low Income Energy Efficiency Program Total		1.00	1.16	\$35,173.64	\$15,768.57	\$20,482.41	\$71,424.62	\$17,276.47	\$51,319.51	\$14,033.35	\$0.00	\$82,629.34
C&I Energy Solutions Program - Small	PY18	1.0	1.15	\$12,462.27	\$46,854.94	\$11,704.08	\$71,021.29	\$24,253.77	\$59,253.49	-\$1,522.80	-\$81.02	\$81,903.44
	PY19	1.0	1.17	\$12,432.46	\$47,463.18	\$10,892.29	\$70,787.93	\$24,150.33	\$60,418.20	-\$1,545.37	-\$81.02	\$82,942.13
	PY20	1.0	1.19	\$12,432.48	\$47,848.78	\$10,776.62	\$71,057.88	\$24,806.54	\$61,594.80	-\$1,578.96	-\$81.02	\$84,741.36
	PY21	1.0	1.22	\$12,436.49	\$47,844.77	\$10,796.66	\$71,077.92	\$25,424.49	\$62,823.02	-\$1,625.31	-\$81.02	\$86,541.18
	PY22	1.0	1.24	\$12,436.49	\$47,844.77	\$10,893.21	\$71,174.47	\$26,012.23	\$64,060.21	-\$1,684.82	-\$81.02	\$88,306.59
C&I Energy Solutions Program - Small Total		1.00	1.20	\$62,200.18	\$237,856.44	\$55,062.87	\$355,119.49	\$124,647.35	\$308,149.72	-\$7,957.27	-\$405.10	\$424,434.70
C&I Energy Solutions Program - Large	PY18	1.0	1.06	\$10,766.07	\$53,920.91	\$8,772.58	\$73,459.56	\$16,449.47	\$66,046.22	-\$4,403.18	-\$380.79	\$77,711.72
	PY19	1.0	1.04	\$10,752.32	\$56,653.31	\$8,143.49	\$75,549.12	\$15,918.13	\$67,388.09	-\$4,476.56	-\$380.79	\$78,448.87
	PY20	1.0	1.04	\$10,752.35	\$58,465.71	\$8,045.29	\$77,263.36	\$16,247.67	\$68,742.00	-\$4,571.89	-\$380.79	\$80,036.97
	PY21	1.0	1.06	\$10,758.69	\$58,459.37	\$8,054.14	\$77,272.21	\$16,584.60	\$70,152.88	-\$4,691.99	-\$380.79	\$81,664.70
	PY22	1.0	1.08	\$10,758.69	\$58,459.37	\$8,120.92	\$77,338.99	\$16,927.98	\$71,545.53	-\$4,838.60	-\$380.79	\$83,254.12
C&I Energy Solutions Program - Large Total		1.00	1.05	\$53,788.13	\$285,958.67	\$41,136.43	\$380,883.23	\$82,127.85	\$343,874.72	-\$22,982.22	-\$1,903.97	\$401,116.38
Total⁶		1.00	1.12	\$196,939.71	\$664,303.80	\$181,605.13	\$1,042,848.65	\$309,303.98	\$861,793.58	-\$3,953.28	-\$3,933.52	\$1,163,210.76

¹ The TRC ratio compares the present value of the TRC benefits to the present value of the TRC costs with both costs and benefits expressed in \$2026

² Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

³ Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

⁴ Capacity costs include generation, transmission, distribution, and capacity DRIPE.

⁵ Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPE components.

⁶ If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

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Table 14: TRC Benefits Table (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program	Program Year ²	NTGR	Net TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Solutions Program	PY18	0.72	0.88	\$8,937.94	\$15,902.73	\$12,932.20	\$37,772.87	\$9,808.53	\$22,078.16	\$1,469.39	-\$299.67	\$33,056.41
	PY19	0.77	0.91	\$8,908.39	\$18,052.34	\$13,336.37	\$40,297.11	\$10,562.47	\$24,868.50	\$1,498.88	-\$299.67	\$36,630.18
	PY20	0.74	0.84	\$8,898.16	\$19,475.95	\$13,010.55	\$41,384.66	\$10,112.49	\$23,344.66	\$1,536.25	-\$299.67	\$34,693.73
	PY21	0.80	0.88	\$7,052.22	\$17,238.35	\$12,810.90	\$37,101.48	\$9,626.40	\$21,876.22	\$1,582.66	-\$299.67	\$32,785.61
	PY22	0.78	0.83	\$7,052.22	\$17,238.35	\$12,833.40	\$37,123.98	\$8,959.59	\$20,482.16	\$1,628.75	-\$299.67	\$30,770.83
Residential Energy Solutions Program Total		0.76	0.87	\$40,848.94	\$87,907.73	\$64,923.43	\$193,680.10	\$49,069.48	\$112,649.70	\$7,715.93	-\$1,498.35	\$167,936.76
Low Income Energy Efficiency Program	PY18	0.81	0.95	\$6,619.79	\$2,622.81	\$4,404.31	\$13,646.91	\$2,614.81	\$8,314.90	\$1,994.88	\$0.00	\$12,924.60
	PY19	0.83	0.99	\$6,616.31	\$2,626.29	\$4,097.17	\$13,339.77	\$2,580.14	\$8,612.39	\$2,034.73	\$0.00	\$13,227.26
	PY20	0.82	1.01	\$6,616.31	\$2,626.29	\$4,103.56	\$13,346.16	\$2,659.67	\$8,738.17	\$2,075.43	\$0.00	\$13,473.27
	PY21	0.81	1.02	\$6,574.66	\$2,481.37	\$4,082.37	\$13,138.40	\$2,665.30	\$8,683.38	\$2,117.02	\$0.00	\$13,465.71
	PY22	0.78	1.05	\$6,574.66	\$2,481.37	\$3,795.00	\$12,851.02	\$2,655.25	\$8,645.89	\$2,159.53	\$0.00	\$13,460.68
Low Income Energy Efficiency Program Total		0.81	1.00	\$33,001.72	\$12,838.13	\$20,482.41	\$66,322.26	\$13,175.17	\$42,994.74	\$10,381.60	\$0.00	\$66,551.51
C&I Energy Solutions Program - Small	PY18	0.76	1.10	\$12,421.03	\$32,159.94	\$11,704.08	\$56,285.05	\$17,592.86	\$45,322.48	-\$790.65	-\$49.50	\$62,075.19
	PY19	0.76	1.13	\$12,391.22	\$32,543.18	\$10,892.29	\$55,826.69	\$17,558.12	\$46,198.29	-\$801.42	-\$49.50	\$62,905.50
	PY20	0.76	1.15	\$12,391.24	\$32,778.78	\$10,776.62	\$55,946.64	\$18,018.01	\$47,084.86	-\$819.14	-\$49.50	\$64,234.23
	PY21	0.76	1.17	\$12,395.25	\$32,774.76	\$10,796.66	\$55,966.67	\$18,454.43	\$48,008.77	-\$844.95	-\$49.50	\$65,568.75
	PY22	0.76	1.19	\$12,395.25	\$32,774.76	\$10,893.21	\$56,063.23	\$18,869.36	\$48,945.78	-\$879.07	-\$49.50	\$66,886.57
C&I Energy Solutions Program - Small Total		0.81	1.15	\$61,993.99	\$163,031.42	\$55,062.87	\$280,088.27	\$90,492.79	\$235,560.20	-\$4,135.22	-\$247.52	\$321,670.25
C&I Energy Solutions Program - Large	PY18	0.67	0.97	\$10,756.27	\$33,854.44	\$8,772.58	\$53,383.29	\$10,664.91	\$44,225.07	-\$2,736.82	-\$232.67	\$51,920.50
	PY19	0.67	0.96	\$10,743.73	\$35,528.09	\$8,143.49	\$54,415.31	\$10,402.28	\$45,116.53	-\$2,782.37	-\$232.67	\$52,503.77
	PY20	0.67	0.97	\$10,743.77	\$36,635.46	\$8,045.29	\$55,424.52	\$10,616.70	\$46,016.81	-\$2,841.62	-\$232.67	\$53,559.22
	PY21	0.67	0.99	\$10,750.11	\$36,629.12	\$8,054.14	\$55,433.37	\$10,835.56	\$46,954.40	-\$2,916.35	-\$232.67	\$54,640.93
	PY22	0.67	1.00	\$10,750.11	\$36,629.12	\$8,120.92	\$55,500.15	\$11,058.94	\$47,882.52	-\$3,007.61	-\$232.67	\$55,701.19
C&I Energy Solutions Program - Large Total		0.67	0.98	\$53,743.99	\$179,276.24	\$41,136.43	\$274,156.66	\$53,578.39	\$230,195.33	-\$14,284.77	-\$1,163.34	\$268,325.61
Total ⁶		0.73	1.01	\$189,588.64	\$443,053.52	\$181,605.13	\$814,247.28	\$206,315.84	\$621,399.97	-\$322.47	-\$2,909.21	\$824,484.13

¹ The TRC ratio compares the present value of the TRC benefits to the present value of the TRC costs with both costs and benefits expressed in \$2026

² Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

³ Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

⁴ Capacity costs include generation, transmission, distribution, and capacity DRPE.

⁵ Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRPE components.

⁶ If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 15: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Sector	Total Discounted Lifetime Costs (\$000)	Total Discounted Lifetime Benefits (\$000) ³	Present Value of Net ¹ Benefits (\$000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate EE (exclusive of Low-Income) ²	\$678,201	\$799,906	\$121,705	1.2
Low-Income	\$108,158	\$109,972	\$1,815	1.0
Solar PV	\$184,140	\$147,860	-\$36,280	0.8
CHP	\$53,444	\$84,519	\$31,075	1.6
Demand Response	\$18,906	\$20,954	\$2,048	1.1
Total Portfolio	\$1,042,849	\$1,163,211	\$120,362	1.1

¹ “Net” refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

² The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

³ Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

**Appendix C:
Company Supplemental Information**

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY18		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	22,434,262	5,973.74	2,713.80
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	142.25	196.02
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	11,814,130	2,358.56	2,353.31
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	9,336.18	12,318.14
	FTM-Res	-	-	-
Subtotal		55,428,522	21,236.54	20,936.50
Low Income Energy Efficiency Program	Weatherization	4,552,518	474.18	938.55
	LI - Products	4,790,675	2,217.44	327.49
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	2,992,000	379.78	378.03
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
Subtotal		14,272,945	3,324.08	1,930.63
Residential Total		69,701,466	24,560.62	22,867.13
C&I Energy Solutions Program - Small ¹	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	35,169,044	7,744.20	4,495.28
	Custom - SCI	14,952,250	2,136.94	1,248.83
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	1,771.62	1,822.05
	FTM-SCI	-	-	-
Subtotal		71,945,357	14,617.29	10,010.02
Small Commercial & Industrial Total		71,945,357	14,617.29	10,010.02
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,206.33	2,256.77
	FTM-LCI	-	-	-
Subtotal		78,865,770	14,740.49	11,125.18
Large Commercial & Industrial Total		78,865,770	14,740.49	11,125.18
Non-Residential Total		150,811,127	29,357.77	21,135.19
Total		220,512,593	53,918.40	44,002.32

¹ Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY19		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	22,434,262	5,973.74	2,713.80
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	142.25	196.02
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	23,882,190	4,335.15	4,329.90
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	11,743.00	16,657.67
	FTM-Res	-	-	-
Subtotal		67,496,582	25,619.96	27,252.62
Low Income Energy Efficiency Program	Weatherization	4,552,518	474.18	938.55
	LI - Products	4,790,675	2,217.44	327.49
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	4,182,000	459.67	457.92
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
Subtotal		15,462,945	3,403.98	2,010.52
Residential Total		82,959,526	29,023.94	29,263.15
C&I Energy Solutions Program - Small ¹	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	35,169,044	7,744.20	4,495.28
	Custom - SCI	14,952,250	2,136.94	1,248.83
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	1,983.27	2,041.26
	FTM-SCI	-	-	-
Subtotal		71,945,357	14,828.93	10,229.23
Small Commercial & Industrial Total		71,945,357	14,828.93	10,229.23
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,214.97	2,272.97
	FTM-LCI	-	-	-
Subtotal		78,865,770	14,749.13	11,141.38
Large Commercial & Industrial Total		78,865,770	14,749.13	11,141.38
Non-Residential Total		150,811,127	29,578.06	21,370.61
Total		233,770,653	58,602.00	50,633.76

¹ Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY20		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	22,413,755	5,970.72	2,710.77
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	142.25	196.02
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	15,845,940	3,444.26	3,439.01
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	13,274.70	20,094.28
	FTM-Res	-	-	-
Subtotal		59,439,824	26,257.74	29,795.31
Low Income Energy Efficiency Program	Weatherization	4,552,518	474.18	938.55
	LI - Products	4,790,675	2,217.44	327.49
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	3,773,000	485.94	484.19
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	Subtotal	15,053,945	3,430.25	2,036.79
Residential Total		74,493,769	29,687.99	31,832.10
C&I Energy Solutions Program - Small ¹	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	35,169,044	7,744.20	4,495.28
	Custom - SCI	14,952,250	2,136.94	1,248.83
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,060.85	2,123.88
	FTM-SCI	-	-	-
Subtotal		71,945,357	14,906.51	10,311.85
Small Commercial & Industrial Total		71,945,357	14,906.51	10,311.85
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,222.16	2,285.21
	FTM-LCI	-	-	-
Subtotal		78,865,770	14,756.32	11,153.61
Large Commercial & Industrial Total		78,865,770	14,756.32	11,153.61
Non-Residential Total		150,811,127	29,662.83	21,465.47
Total		225,304,896	59,350.82	53,297.56

¹ Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY21		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	13,075,221	4,888.71	913.84
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	1,003,633	201.97	281.88
	Multi Family - Res	143,543	18.89	20.54
	Behavioral	22,985,280	3,608.43	3,603.18
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	13,926.45	21,166.85
	FTM-Res	-	-	-
Subtotal		57,564,575	26,054.66	29,324.55
Low Income Energy Efficiency Program	Weatherization	4,552,518	474.18	938.55
	LI - Products	4,631,659	2,193.93	305.76
	LI - HVAC	3,064	0.43	0.61
	LI - Audits	-	-	-
	LI - Behavioral	2,656,000	346.94	345.19
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
Subtotal		13,768,359	3,266.64	1,874.22
Residential Total		71,332,934	29,321.30	31,198.77
C&I Energy Solutions Program - Small ¹	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	35,169,044	7,744.20	4,495.28
	Custom - SCI	14,952,250	2,136.94	1,248.83
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,107.36	2,177.96
	FTM-SCI	-	-	-
Subtotal		71,945,357	14,953.03	10,365.93
Small Commercial & Industrial Total		71,945,357	14,953.03	10,365.93
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,231.87	2,302.49
	FTM-LCI	-	-	-
Subtotal		78,865,770	14,766.03	11,170.89
Large Commercial & Industrial Total		78,865,770	14,766.03	11,170.89
Non-Residential Total		150,811,127	29,719.05	21,536.82
Total		222,144,061	59,040.35	52,735.59

¹ Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY22		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	13,075,221	4,888.71	913.84
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	1,003,633	201.97	281.88
	Multi Family - Res	143,543	18.89	20.54
	Behavioral	17,470,562	1,877.80	1,872.54
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	14,491.74	22,239.42
	FTM-Res	-	-	-
Subtotal		52,049,857	24,889.31	28,666.49
Low Income Energy Efficiency Program	Weatherization	4,552,518	474.18	938.55
	LI - Products	4,631,659	2,193.93	305.76
	LI - HVAC	3,064	0.43	0.61
	LI - Audits	-	-	-
	LI - Behavioral	749,400	37.32	35.57
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
Subtotal		11,861,759	2,957.02	1,564.60
Residential Total		63,911,616	27,846.33	30,231.09
C&I Energy Solutions Program - Small ¹	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	35,169,044	7,744.20	4,495.28
	Custom - SCI	14,952,250	2,136.94	1,248.83
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,142.61	2,218.25
	FTM-SCI	-	-	-
Subtotal		71,945,357	14,988.27	10,406.22
Small Commercial & Industrial Total		71,945,357	14,988.27	10,406.22
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,239.06	2,314.72
	FTM-LCI	-	-	-
Subtotal		78,865,770	14,773.22	11,183.12
Large Commercial & Industrial Total		78,865,770	14,773.22	11,183.12
Non-Residential Total		150,811,127	29,761.49	21,589.35
Total		214,722,743	57,607.82	51,820.43

¹ Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		Total		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	93,432,722	27,695.60	9,966.04
	HVAC & Solar	82,225,765	14,533.49	12,748.79
	Comprehensive Audits	4,121,332	830.68	1,151.82
	Multi Family - Res	642,718	84.58	91.96
	Behavioral	91,998,102	15,624.21	15,597.94
	New Homes	19,558,720	2,517.58	3,942.56
	DLS & DR - Res	-	62,772.06	92,476.35
	FTM-Res	-	-	-
Subtotal		291,979,359	124,058.21	135,975.47
Low Income Energy Efficiency Program	Weatherization	22,762,592	2,370.89	4,692.75
	LI - Products	23,635,342	11,040.17	1,594.01
	LI - HVAC	44,028	5.48	8.56
	LI - Audits	-	-	-
	LI - Behavioral	14,352,400	1,709.66	1,700.90
	LI - New Homes	411,812	53.01	83.01
	LI - Multifamily - Res	9,213,779	1,202.76	1,337.53
Subtotal		70,419,953	16,381.97	9,416.76
Residential Total		362,399,312	140,440.18	145,392.23
C&I Energy Solutions Program - Small ¹	Multi Family - SCI	18,779,378	2,398.52	2,605.05
	Prescriptive - SCI	175,845,220	38,721.02	22,476.39
	Custom - SCI	74,761,250	10,684.68	6,244.15
	Energy Management - SCI	90,340,935	12,424.10	9,614.25
	DLS & DR - SCI	-	10,065.70	10,383.41
	FTM-SCI	-	-	-
Subtotal		359,726,783	74,294.03	51,323.26
Small Commercial & Industrial Total		359,726,783	74,294.03	51,323.26
C&I Energy Solutions Program - Large	Multi Family - LCI	60,084	7.90	8.25
	Prescriptive - LCI	156,665,893	26,343.49	22,708.34
	Custom - LCI	234,102,875	35,875.82	21,375.04
	Energy Management - LCI	3,500,000	443.56	250.39
	DLS & DR - LCI	-	11,114.41	11,432.16
	FTM-LCI	-	-	-
Subtotal		394,328,852	73,785.18	55,774.18
Large Commercial & Industrial Total		394,328,852	73,785.18	55,774.18
Non-Residential Total		754,055,635	148,079.21	107,097.44
Total		1,116,454,947	288,519.39	252,489.67

¹ Includes projected participation of Low Income households living in Multifamily housing.

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	Products	Freezer Recycling	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator Recycling	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dehumidifier Recycling	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Cooler Recycling	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Washer	14	112	0.017	0.017	0.59	\$36	\$25	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	14	75	0.010	0.008	0.59	\$0	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	11	41	0.006	0.004	0.59	\$0	\$10	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	14	74	0.010	0.010	0.59	\$206	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	14	33	0.004	0.005	0.59	\$206	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	9	172	0.019	0.025	0.59	\$39	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Room Air Conditioner	9	13	0.022	0.000	0.59	\$95	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dehumidifier	12	148	0.028	0.000	0.59	\$0	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	10	1,960	0.207	0.345	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	10	231	0.024	0.041	0.59	\$1,685	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	10	110	0.035	0.000	0.59	\$218	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dishwasher	10	49	0.008	0.013	0.59	\$79	\$10	\$0.00	0.00	380.55	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	10	22	0.002	0.002	0.59	\$143	\$40	\$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	PA IC DB
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncls	9	211	0.039	0.016	0.59	\$104	\$25	\$0.00	6.87	0.00	1 Unit controlling 2.5 Ton CAC / ASHP	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Cooler	14	45	0.006	0.005	0.59	\$282	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	14	145	0.021	0.021	0.59	\$242	\$48	\$0.00	0.13	1,763.55	1 Unit	PA TRM	Co Assumption	Co Assumption
Residential Energy Solutions Program	Products	LED Linear	15	20	0.003	0.003	0.59	\$14	\$10	\$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	8	14	0.000	0.000	0.59	\$3	\$3	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	10	13	0.000	0.000	0.59	\$1	\$1	\$0.00	0.00	0.00	100 Light String	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	5	113	0.013	0.016	0.59	\$41	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	8	20	0.003	0.003	0.59	\$25	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	15	20	0.003	0.003	0.59	\$14	\$10	\$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Agricultural Process Lighting	7	36	0.004	0.004	0.66	\$21	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Auto Milker Takeoff	10	1,938	0.329	0.329	0.66	\$9,025	\$414	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	15	797	0.136	0.136	0.66	\$557	\$114	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	HE Ventilation Fans	13	656	0.129	0.000	0.66	\$226	\$82	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Reclaimer	15	5,055	0.859	0.910	0.66	\$5,840	\$727	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	15	8,600	4.300	0.000	0.66	\$5,608	\$1,398	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Livestock Waterer	10	1,004	0.000	0.400	0.66	\$553	\$150	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	15	10,076	1.411	1.411	0.66	\$6,717	\$1,360	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Low Pressure Irrigation	5	12,985	33.760	0.000	0.66	\$13,745	\$5,519	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Custom - Agricultural	15	100,000	10.000	10.000	0.66	\$40,520	\$12,500	\$0.00	0.00	0.00	1 Unit	Actuals	Co Assumption	Actuals
Residential Energy Solutions Program	Products	Engine Block Heater Timer	15	738	0.000	0.000	0.66	\$17	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	15	567	0.074	0.102	0.54	\$418	\$300	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	15	1,467	0.075	0.212	0.54	\$1,044	\$600	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	15	296	0.135	0.000	0.54	\$418	\$150	\$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	15	596	0.163	0.000	0.54	\$1,044	\$300	\$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	15	1,023	0.078	0.180	0.54	\$711	\$400	\$0.00	0.00	0.00	1- 1.5 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	PTAC	15	173	0.091	0.000	0.54	\$522	\$100	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	PTHP	15	220	0.091	0.014	0.54	\$522	\$100	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	15	1,516	0.447	0.521	0.54	\$18,665	\$4,000	\$0.00	0.00	0.00	1- 3 Ton Unit	PA TRM	PA TRM	Co Assumption
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	5	195	0.045	0.043	0.54	\$196	\$50	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	9	318	0.045	0.029	0.54	\$104	\$50	\$0.00	4.97	0.00	1 Unit controlling 2.5 Ton CAC / ASHP	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	3	127	0.051	0.000	0.54	\$141	\$50	\$0.00	0.00	0.00	1 - Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	15	24	0.003	0.004	0.54	\$52	\$25	\$0.00	0.00	0.00	1-20 CFM unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	9	399	0.048	0.735	0.54	\$1,228	\$300	\$0.00	0.00	0.00	1 - Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	15	7,144	0.135	2.204	0.54	\$2,088	\$2,000	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	15	3,945	0.078	1.394	0.54	\$3,553	\$1,000	\$0.00	0.00	0.00	1- 1.5 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	15	3,596	0.091	1.035	0.54	\$2,610	\$1,000	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Solar	15	1,263	0.299	0.040	0.92	\$1,911	\$150	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	5	1,425	0.250	0.410	0.92	\$2,929	\$1,750	\$0.00	0.00	86.64	1 - Audit w DI & Wgtd Retrofits	PA TRM	Actuals	Actuals
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	15	1,263	0.299	0.040	0.92	\$1,911	\$150	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	15	567	0.075	0.102	0.54	\$731	\$450	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	15	296	0.140	0.000	0.54	\$731	\$225	\$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	10	231	0.025	0.041	0.59	\$1,915	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453.17	1 Tenant Space	PA TRM	PA TRM	Actuals
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	1	31	0.006	0.006	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	2	55	0.009	0.009	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	1	45	0.009	0.009	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	2	58	0.008	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	1	47	0.005	0.005	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	On-Line Audit	1	150	0.010	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	Co Assumption	Actuals	Co Assumption
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Townhouse and Duplex	PA TRM	Actuals	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Two on Two Cond Units	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	14	2,367	0.278	0.436	0.72	\$2,803	\$1,100	\$0.00	0.00	0.00	NC Single Family Detached	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	14	1,657	0.195	0.305	0.72	\$2,803	\$650	\$0.00	0.00	0.00	NC Mfg Housing	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	1	0	0.011	0.011	0.00	\$0	\$0	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	1	0	0.200	0.200	0.00	\$0	\$155	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Storage	1	0	2.350	4.700	0.00	\$0	\$810	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	1	0	0.220	0.380	0.00	\$0	\$45	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Summer	1	0	0.158	0.000	0.00	\$0	\$0	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Winter	1	0	0.000	0.530	0.00	\$0	\$0	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	0	0	0.000	0.000	0.00	0	\$0	\$0.00	0.00	0.00	-	-	-	-
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	13	105	0.012	0.015	1.00	\$173	\$173	\$0.00	0.00	226.58	1 Tenant Space	PA TRM	PA TRM	Co Assumption
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	15	3,596	0.091	1.035	0.54	\$3,600	\$3,600	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	Weatherization	WARM Plus	13	1,248	0.122	0.224	1.00	\$1,275	\$1,275	\$0.00	0.00	281.42	Per HH	PA TRM	Actuals	Co Assumption
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	13	1,000	0.100	0.200	1.00	\$1,033	\$1,033	\$0.00	0.00	385.00	Per HH	PA TRM	Actuals	Co Assumption
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Washer - LI	14	112	0.017	0.017	0.59	\$36	\$28	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	14	75	0.010	0.008	0.59	\$0	\$22	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	11	41	0.006	0.004	0.59	\$0	\$12	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	14	74	0.010	0.010	0.59	\$206	\$27	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	14	33	0.004	0.005	0.59	\$206	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	9	172	0.019	0.025	0.59	\$39	\$32	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	9	13	0.022	0.000	0.59	\$95	\$17	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	12	148	0.028	0.000	0.59	\$0	\$34	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	10	49	0.008	0.013	0.59	\$79	\$12	\$0.00	0.00	380.55	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	14	145	0.021	0.021	0.59	\$242	\$35	\$0.00	0.13	1,763.55	1 Unit	PA TRM	Co Assumption	Co Assumption
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	15	20	0.003	0.003	0.59	\$14	\$12	\$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mktplace) - LI	8	14	0.000	0.000	0.59	\$3	\$3	\$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mktplace) - LI	10	13	0.000	0.000	0.59	\$1	\$3	\$0.00	0.00	0.00	100 Light String	-	-	-
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	5	113	0.013	0.016	0.59	\$41	\$20	\$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	8	20	0.003	0.003	0.59	\$25	\$12	\$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mktplace) - LI	15	20	0.003	0.003	0.59	\$14	\$10	\$0.00	0.00	0.00	Per 4' Unit	-	-	-
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	15	567	0.074	0.102	0.54	\$1,148	\$450	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	10	1,960	0.207	0.345	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	10	231	0.024	0.041	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	0	0	0.000	0.000	0.00	\$0	\$1,000	\$0.00	0.00	0.00	-	-	-	-
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	1	66	0.008	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	1	94	0.010	0.010	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	1	73	0.009	0.009	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	1	52	0.006	0.006	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	1	58	0.002	0.002	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	1	150	0.010	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	Co Assumption	Actuals	Co Assumption

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Low Income Energy Efficiency Program	LI - New Homes	NC - Townhouse and duplex units - LI	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Townhouse and Duplex	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Two on Two Cond Units	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	14	2,367	0.278	0.436	0.72	\$2,803	\$1,100	\$0.00	0.00	0.00	NC Single Family Detached	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise - LI	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	14	1,657	0.195	0.305	0.72	\$2,803	\$650	\$0.00	0.00	0.00	NC Mfg Housing	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - DI - Res - LI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453.17	1 Tenant Space	PA TRM	PA TRM	Actuals
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - DI - Res - LI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Prescriptive - Res - LI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Prescriptive - Res - LI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Custom - Res - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Custom - Res - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453.17	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453.17	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 <=5.4 Tn - SCI	15	269	0.125	0.000	0.66	\$2,088	\$67	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	15	1,409	0.657	0.000	0.66	\$1,860	\$352	\$0.00	0.00	0.00	1- 11 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >=20 Tn - SCI	15	1,607	0.749	0.000	0.66	\$709	\$402	\$0.00	0.00	0.00	1- 20 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	15	666	0.132	0.136	0.66	\$556	\$167	\$0.00	0.00	0.00	1 - 5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	15	1,920	0.263	0.481	0.66	\$31,108	\$480	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP – SCI	15	354	0.054	0.085	0.66	\$711	\$89	\$0.00	0.00	0.00	1-1.5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	15	83	0.039	0.000	0.66	\$169	\$21	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	15	155	0.039	0.025	0.66	\$140	\$39	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner- SCI	9	24	0.040	0.000	0.66	\$95	\$6	\$0.00	0.00	0.00	1-1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	11	204	0.017	0.000	0.66	\$76	\$51	\$0.00	6.87	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom - SCI	15	100,000	10.000	5.000	0.66	\$40,520	\$25,000	\$0.00	0.00	0.00	1 Project	PA TRM	Co Assumption	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	15	282	0.000	0.005	0.66	\$66	\$70	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	3	296	0.105	0.001	0.66	\$438	\$74	\$0.00	0.00	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	5	202	0.026	0.014	0.66	\$395	\$51	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	8	106	0.017	0.014	0.66	\$53	\$8	\$0.00	-0.10	0.00	1 unit controller	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	8	1	0.000	0.000	0.66	\$1	\$0	\$0.00	0.00	0.00	Per sq-ft of building lighting controlled	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	14	172	0.028	0.023	0.66	\$207	\$14	\$0.00	-0.15	0.00	1- 4 lamp trougher	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	15	210	0.024	0.024	0.66	\$69	\$17	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	14	414	0.013	0.067	0.66	\$412	\$33	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	14	586	0.095	0.077	0.66	\$466	\$47	\$0.00	-0.53	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	14	394	0.064	0.052	0.66	\$430	\$32	\$0.00	-0.35	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	14	252	0.000	0.030	0.66	\$197	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzr Light - SCI	8	253	0.036	0.033	0.66	\$59	\$20	\$0.00	-0.23	0.00	1 Door	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzr Occupancy Sensor - SCI	8	76	0.011	0.010	0.66	\$53	\$6	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	14	100,000	16.150	13.147	0.66	\$39,800	\$8,000	\$0.00	-90.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	14	500,000	80.752	65.736	0.66	\$198,999	\$40,000	\$0.00	-450.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB

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Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	14	21	0.004	0.003	0.66	\$31	\$2	\$0.00	-0.02	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	14	293	0.060	0.040	0.66	\$244	\$23	\$0.00	-0.26	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	14	83	0.017	0.011	0.66	\$122	\$7	\$0.00	-0.07	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	8	60	0.012	0.008	0.66	\$53	\$5	\$0.00	-0.05	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frzz -Reach In Special Doors (low/No Anti Swt)- SCI	12	206	0.024	0.024	0.66	\$504	\$19	\$0.00	0.00	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	15	1,417	0.162	0.162	0.66	\$353	\$128	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	15	818	0.077	0.077	0.66	\$767	\$74	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	12	537	0.061	0.061	0.66	\$683	\$48	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	12	2,332	0.266	0.266	0.66	\$453	\$210	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	9	79	0.000	0.000	0.66	\$79	\$7	\$0.00	0.00	0.00	Per LF of Case	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls - SCI	12	673	0.023	0.018	0.66	\$1,119	\$61	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	4	37	0.007	0.007	0.66	\$10	\$3	\$0.00	0.00	0.00	Per SF	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	10	428	0.080	0.051	0.66	\$381	\$38	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	5	375	0.000	0.000	0.66	\$234	\$34	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	12	5,276	0.983	0.629	0.66	\$2,538	\$475	\$0.00	0.00	0.00	1- unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	12	1,187	0.221	0.142	0.66	\$1,903	\$107	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	12	2,739	0.510	0.327	0.66	\$1,289	\$247	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	12	545	0.101	0.065	0.66	\$550	\$49	\$0.00	0.00	0.00	1-15 CU. FT. unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	12	4,682	0.872	0.558	0.66	\$1,899	\$421	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	12	2,554	0.476	0.304	0.66	\$1,118	\$230	\$0.00	0.00	0.00	1-full size unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	10	3,765	0.701	0.449	0.66	\$1,540	\$339	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	10	23	0.004	0.003	0.66	\$574	\$2	\$0.00	0.00	0.00	1-Two well unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	8	1,841	0.476	0.260	0.66	\$113	\$166	\$0.00	0.00	14,016.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	10	22	0.002	0.002	0.59	\$143	\$40	\$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer - SCI	14	112	0.017	0.017	0.59	\$36	\$26	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	14	74	0.010	0.010	0.59	\$206	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	10	231	0.024	0.041	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	12	148	0.028	0.000	0.59	\$0	\$32	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	7	2,840	0.324	0.324	0.66	\$47	\$350	\$0.00	0.00	0.00	1 - 5kVA Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	7	36	0.004	0.004	0.66	\$21	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	10	1,938	0.329	0.329	0.66	\$9,025	\$414	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	15	797	0.136	0.136	0.66	\$557	\$114	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	13	656	0.129	0.000	0.66	\$226	\$82	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	15	5,055	0.859	0.910	0.66	\$5,840	\$727	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	15	8,600	4.300	0.000	0.66	\$5,608	\$1,398	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	10	1,004	0.000	0.400	0.66	\$553	\$150	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	15	10,076	1.411	1.411	0.66	\$6,717	\$1,360	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	5	12,985	33.760	0.000	0.66	\$13,745	\$5,519	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	15	100,000	10.000	10.000	0.66	\$40,520	\$12,500	\$0.00	0.00	0.00	1 Unit	Actuals	Co Assumption	Actuals
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	15	738	0.000	0.000	0.66	\$17	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	15	100,000	9.500	6.500	0.61	\$40,520	\$9,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	15	100,000	12.000	12.000	0.61	\$46,285	\$9,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	15	100,000	9.500	7.600	0.61	\$40,520	\$9,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	15	1,151	0.285	0.041	0.61	\$1,928	\$150	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	15	10,000,000	1114.156	1114.156	0.61	\$4,529,326	\$900,000	\$0.00	-52,507.22	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	15	100,000	4.000	1.000	1.00	\$149,388	\$20,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	15	100,000	12.000	4.000	1.00	\$29,997	\$20,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1	0	0.000	0.000	1.00	\$1,225	\$1,250	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Tune Up - SCI	13	51,851	6.780	5.555	0.98	\$37,783	\$16,592	\$0.00	0.00	0.00	1 Project	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Virtual/Meter Data Commissioning - SCI	2	10,000	0.800	0.667	0.98	\$1,173	\$1,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Co Assumption	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Retrocommissioning - SCI	3	10,000	0.800	0.667	0.98	\$5,864	\$1,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Operations Training - SCI	13	50,000	6.667	3.333	0.98	\$6,000	\$5,000	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Customer Concierge - SCI	1	0	0.000	0.000	1.00	\$3,500	\$1,000	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Energy Consultation - SCI	1	0	0.000	0.000	1.00	\$1,225	\$1,000	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Audits - SCI	1	0	0.000	0.000	1.00	\$1,225	\$1,000	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	1	0	0.200	0.200	0.00	\$0	\$155	\$0.00	0.00	0.00	Company Assumption	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	1	0	2.350	4.700	0.00	\$0	\$810	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	1	0	0.300	0.300	0.00	\$0	\$45	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	1	0	0.326	0.326	0.00	\$0	\$0	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	1	0	75.000	75.000	0.00	\$0	\$15,000	\$0.00	0.00	0.00	Vendor	-	-	-
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	0	0	0.000	0.000	0.00	0	\$0	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453.17	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 <=5.4 Tn - LCI	15	269	0.125	0.000	0.66	\$2,088	\$67	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	15	1,409	0.657	0.000	0.66	\$1,860	\$352	\$0.00	0.00	0.00	1- 11 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >=20 Tn - LCI	15	1,607	0.749	0.000	0.66	\$709	\$402	\$0.00	0.00	0.00	1- 20 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	15	666	0.132	0.136	0.66	\$556	\$167	\$0.00	0.00	0.00	1 - 5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	15	1,920	0.263	0.481	0.66	\$31,108	\$480	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP – LCI	15	354	0.054	0.085	0.66	\$711	\$89	\$0.00	0.00	0.00	1-1.5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	15	83	0.039	0.000	0.66	\$169	\$21	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	15	155	0.039	0.025	0.66	\$140	\$39	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner- LCI	9	24	0.040	0.000	0.66	\$95	\$6	\$0.00	0.00	0.00	1-1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	11	204	0.017	0.000	0.66	\$76	\$51	\$0.00	6.87	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom - LCI	15	100,000	10.000	5.000	0.66	\$40,520	\$25,000	\$0.00	0.00	0.00	1 Project	PA TRM	Co Assumption	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	15	282	0.000	0.005	0.66	\$66	\$70	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	3	296	0.105	0.001	0.66	\$438	\$74	\$0.00	0.00	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	5	202	0.026	0.014	0.66	\$395	\$51	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	8	106	0.017	0.014	0.66	\$53	\$8	\$0.00	-0.10	0.00	1 unit controller	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	8	1	0.000	0.000	0.66	\$1	\$0	\$0.00	0.00	0.00	Per sq-ft of building lighting controlled	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	14	172	0.028	0.023	0.66	\$207	\$14	\$0.00	-0.15	0.00	1- 4 lamp trougher	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	15	210	0.024	0.024	0.66	\$69	\$17	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	14	414	0.013	0.067	0.66	\$412	\$33	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	14	586	0.095	0.077	0.66	\$466	\$47	\$0.00	-0.53	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	14	394	0.064	0.052	0.66	\$430	\$32	\$0.00	-0.35	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	14	252	0.000	0.030	0.66	\$197	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzer Light - LCI	8	253	0.036	0.033	0.66	\$59	\$20	\$0.00	-0.23	0.00	1 Door	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzr Occupancy Sensor - LCI	8	76	0.011	0.010	0.66	\$53	\$6	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	14	100,000	16.150	13.147	0.66	\$39,800	\$8,000	\$0.00	-90.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	14	500,000	80.752	65.736	0.66	\$198,999	\$40,000	\$0.00	-450.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	14	21	0.004	0.003	0.66	\$31	\$2	\$0.00	-0.02	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	14	293	0.060	0.040	0.66	\$244	\$23	\$0.00	-0.26	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	14	83	0.017	0.011	0.66	\$122	\$7	\$0.00	-0.07	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS-LCI	8	60	0.012	0.008	0.66	\$53	\$5	\$0.00	-0.05	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	12	206	0.024	0.024	0.66	\$504	\$19	\$0.00	0.00	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	15	1,417	0.162	0.162	0.66	\$353	\$128	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	15	818	0.077	0.077	0.66	\$767	\$74	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	12	537	0.061	0.061	0.66	\$683	\$48	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	12	2,332	0.266	0.266	0.66	\$453	\$210	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	9	79	0.000	0.000	0.66	\$79	\$7	\$0.00	0.00	0.00	Per LF of Case	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	12	673	0.023	0.018	0.66	\$1,119	\$61	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	4	37	0.007	0.007	0.66	\$10	\$3	\$0.00	0.00	0.00	Per SF	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	10	428	0.080	0.051	0.66	\$381	\$38	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	5	375	0.000	0.000	0.66	\$234	\$34	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	12	5,276	0.983	0.629	0.66	\$2,538	\$475	\$0.00	0.00	0.00	1- unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	12	1,187	0.221	0.142	0.66	\$1,903	\$107	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	12	2,739	0.510	0.327	0.66	\$1,289	\$247	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	12	545	0.101	0.065	0.66	\$550	\$49	\$0.00	0.00	0.00	1-15 CU. FT. unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	12	4,682	0.872	0.558	0.66	\$1,899	\$421	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	12	2,554	0.476	0.304	0.66	\$1,118	\$230	\$0.00	0.00	0.00	1-full size unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	10	3,765	0.701	0.449	0.66	\$1,540	\$339	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	10	23	0.004	0.003	0.66	\$574	\$2	\$0.00	0.00	0.00	1-Two well unit	PA TRM	PA TRM	PA IC DB

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Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	8	1,841	0.476	0.260	0.66	\$113	\$166	\$0.00	0.00	14,016.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	10	22	0.002	0.002	0.59	\$143	\$40	\$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer - LCI	14	112	0.017	0.017	0.59	\$36	\$26	\$0.00	0.13	1,763.55	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	14	74	0.010	0.010	0.59	\$206	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	10	231	0.024	0.041	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	12	148	0.028	0.000	0.59	\$0	\$32	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	7	2,840	0.324	0.324	0.66	\$47	\$350	\$0.00	0.00	0.00	1 - 5kVA Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	15	100,000	9.709	8.766	0.61	\$47,090	\$11,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	15	100,000	11.416	11.416	0.61	\$91,960	\$11,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	15	100,000	9.457	7.566	0.61	\$40,520	\$11,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	15	1,151	0.285	0.041	0.61	\$1,928	\$127	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	15	10,000,000	1114.156	1114.156	0.61	\$4,529,326	\$1,100,000	\$0.00	-52,507.22	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	15	100,000	14.000	11.000	1.00	\$149,388	\$49,960	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	15	100,000	11.411	2.282	1.00	\$29,997	\$49,960	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1	0	0.000	0.000	1.00	\$1,225	\$1,250	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Virtual/Meter Data Commissioning - LCI	2	10,000	0.800	0.667	0.98	\$1,173	\$1,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Co Assumption	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Retrocommissioning - LCI	3	100,000	8.000	6.667	0.61	\$58,637	\$10,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Actuals	Co Assumption

REVISED PLAN 2/19/2026

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Energy Management - LCI	Building Operations Training - LCI	13	50,000	6.667	3.333	0.98	\$6,000	\$5,000	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Customer Concierge - LCI	1	0	0.000	0.000	1.00	\$3,500	\$3,500	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Energy Management - LCI	Energy Consultation - LCI	1	0	0.000	0.000	1.00	\$1,750	\$3,500	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Energy Management - LCI	Audits - LCI	1	0	0.000	0.000	1.00	\$1,750	\$3,500	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	1	0	0.200	0.200	0.00	\$0	\$155	\$0.00	0.00	0.00	Company Assumption	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	1	0	2.350	4.700	0.00	\$0	\$810	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	1	0	200.000	200.000	0.00	\$0	\$40,000	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	0	0	0.000	0.000	0.00	0	\$0	\$0.00	0.00	0.00	-	-	-	-

APPENDIX B

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF FIRSTENERGY	:	Docket No. M-2025-3057327
PENNSYLVANIA ELECTRIC COMPANY	:	
FOR APPROVAL OF A PHASE V ENERGY	:	
EFFICIENCY AND CONSERVATION PLAN	:	
	:	

**STATEMENT IN SUPPORT OF
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

I. INTRODUCTION

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) hereby submits this Statement in Support of the Joint Petition for Complete Settlement (“Joint Petition”) entered into by the Company, the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), all parties in the above-captioned proceeding, and the Met-Ed Industrial Users Group (“MEIUG”), the Penelec Industrial Customer Alliance (“PICA”), the West Penn Power Industrial Intervenors (“WPPII”), and the Keystone Energy Efficiency Alliance (“KEEA”), intervenors in the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners,” and together with the non-opposing intervenors, the “parties”).¹

The Joint Petitioners agree that the Company’s Phase V Energy Efficiency and Conservation (“EE&C”) Plan (“Phase V Plan” or “Plan”) should be approved, as revised, and consistent with the terms and conditions of the Joint Petition. The Joint Petition reflects a carefully balanced compromise of the interests of all of the Joint Petitioners. The Company submits that the Joint Petition should be approved without modification because it is in the public interest, reasonable, and supported by substantial evidence. For the reasons explained below, the Company

¹ The Pennsylvania State University (“PSU”), an intervenor in this matter, does not oppose the Joint Petition.

respectfully requests that the Commission approve the Company's Phase V Plan, as revised, and consistent with the terms and conditions of the Joint Petition.

II. COMMISSION POLICY FAVORS SETTLEMENT

The Commission's policy promotes settlements. *See* 52 Pa. Code § 5.231. Settlements reduce the time and expense that parties must expend litigating a case and, at the same time, conserve administrative resources. *Pa. PUC v. Venango Water Co.*, Docket No. R-2014-2427035, 2015 WL 2251531, at *3 (Apr. 23, 2015 ALJ Decision) (adopted by Commission via Order entered June 11, 2015). The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *See* 52 Pa. Code § 69.401. The Commission has explained that parties to settled cases are afforded flexibility in reaching amicable resolutions, so long as the settlement is in the public interest. *Pennsylvania Public Utility Commission v. CS Water and Sewer Associates*, 74 PA PUC 767,771 (1991). As explained in the next section of this Statement in Support, the Company believes that the Joint Petition should be approved without modification because it is in the public interest, is reasonable, and is supported by substantial evidence.

III. THE JOINT PETITION IS IN THE PUBLIC INTEREST

A. GENERAL

The Joint Petition reflects a carefully balanced compromise of the competing interests of all of the active parties in this proceeding. The Joint Petitioners agree that the Joint Petition is in the public interest. The fact that the Joint Petition is unopposed in this proceeding, in and of itself, provides strong evidence that it is reasonable and in the public interest, particularly given the diverse interests of these parties and the active roles they have taken in this proceeding. Moreover, the Joint Petition was achieved only after a comprehensive investigation of the Company's Phase V Plan. The parties engaged in extensive discovery. Additionally, the Company, OCA, OSBA,

CAUSE-PA, and KEEA submitted direct testimony, and the Company submitted rebuttal testimony. Further, the parties participated in several settlement discussions and formal negotiations that ultimately led to settlement.

Finally, the parties in this proceeding, their counsel, and their expert consultants have considerable experience in EE&C plan proceedings. Their knowledge, experience, and ability to evaluate the strengths and weaknesses of their litigation positions provided a strong base upon which to build a consensus in this proceeding.

For these reasons and the more specific reasons set forth below, the Joint Petition is reasonable and in the public interest. Therefore, the Company's Phase V Plan, as revised and consistent with the terms and conditions of the Joint Petition, as set forth in Appendix A to the Joint Petition, should be approved.

B. RESIDENTIAL AND RESIDENTIAL LOW-INCOME PROGRAM

The Company's Phase V Plan contains two programs specific to the Residential sector: the Energy Solutions Program and the Low-Income Energy Efficiency Program. (Company's Petition, at 12.) In the direct testimony of CAUSE-PA Witness Grevatt, he states that "despite the multiple delivery channels on offer, the Company fails to provide sufficient information in its filing to demonstrate whether [the Company] intends to provide its low-income customers with deep-saving efficiency measures" and therefore proposed modifications or requested clarifications regarding the proposed residential low-income programs. (CAUSE-PA St. No. 1, at 4-10.)

To address the concerns raised by CAUSE-PA regarding the level of detail provided in the Plan regarding residential programs, including the Low-Income Energy Efficiency Program, the parties have reached a reasonable compromise through numerous settlement provisions outlined in the Joint Petition as reflected in the revised Plan, as appended to the Joint Petition. (Joint Petition ¶¶ 23-28; Appendix A to Joint Petition.) Specifically, the Company will target an increase equal

to 650 Megawatt-hour (“MWh”) savings from the Residential Comprehensive Audits and the Residential Multifamily program components in the aggregate over the proposed Plan targets, and to target an equivalent decrease in the MWh savings from its Residential Behavioral program component and commits to tracking and reporting customer participation in the Company’s proposed Residential Comprehensive Audits and Residential Multifamily program components consistent with the reporting templates established for Phase V. (Joint Petition ¶ 23.) The Company also will target decreases from its Low-Income Behavioral program component and its Low-Income Products program component, specifically its LED Linear, Smart Strip Plug Outlets and Air Purifier/Cleaner measures, by 2,500 MWh in the aggregate over the proposed Plan targets. (Joint Petition ¶ 24.) The Company will also target an equivalent 2,500 MWh increase from heat pumps, heat pump water heaters, and building insulation and air sealing measures provided through the Low-Income Weatherization component and/or Low-Income Multifamily program components, in the aggregate. (*Id.*) The Company commits to tracking and reporting customer participation in the Company’s proposed Low-Income Weatherization and Low-Income Multifamily program components consistent with the reporting templates established for Phase V. (*Id.*)

Furthermore, the Company will pursue Health and Safety remediation with other available programs. (Joint Petition ¶ 25.) If other programs are not timely available or applicable, the Company will provide a portion of its Low-Income Weatherization program component budget for Health and Safety remediation, up to 50% of the total weatherization measure cost, when the cost and energy savings attributable to the remediation meets program component acquisition cost based on available program funds. (*Id.*) The Company will develop a description of protocols and processes for addressing health and safety issues, including clear criteria for making referrals to

the Low Income Usage Reduction Program (“LIURP”) or outside agencies versus addressing the Health and Safety issues within the Act 129 programs, and will prepare a process flow chart that illustrates the customer journey from audit through Health and Safety remediation through installation of energy efficiency measures. (*Id.*) The Company will also devise and implement a process for tracking and following up on Health and Safety referrals to reduce the number of deferrals and will share the protocols and processes developed with the parties within 150 days of Commission approval of the Plan. (*Id.*) Additionally, the Company will target spending of at least \$600,000 per year of its Act 129 Low-Income Energy Efficiency Program budget on Health and Safety remediation to remove impediments for the installation of air sealing, insulation, and heat pumps for low-income households, subject to available program funding. (Joint Petition ¶ 26.)

The Company will also strive to continue implementing and operating its low-income programs throughout the full duration of Phase V even if it meets its low-income carveout before the end of the phase. (Joint Petition ¶ 27.) The Company will monitor program expenditures and forecast expected participation and if it identifies that the low-income programs may fully expend their allocated budgets prior to the end of Phase V, the Company will consider reallocation of funds from other programs, subject to the Company’s sole discretion as to its ability to satisfy its other savings targets, requirements and the Plan’s overall cost effectiveness. (*Id.*) The Company will notify the parties if it projects that funds will be depleted prior to the end of Phase V and will inform parties of any plans to reallocate funds from other programs. (*Id.*)

Lastly, the Company will assess cross-participation by Home Energy Report recipients in other residential energy efficiency programs through evaluation of the program and will leverage this information to encourage participation in other residential programs. (Joint Petition ¶ 28.)

These settlement terms provide clarity on concerns raised by CAUSE-PA and incorporate several of CAUSE-PA's recommendations regarding the residential programs, including the Low-Income Energy Efficiency Program, and the measures offered thereunder, these Joint Petition provisions are reasonable and in the public interest and should be approved without modification.

C. SMALL COMMERCIAL AND INDUSTRIAL PROGRAM

The Company's Phase V Plan contains two programs specific to Commercial and Industrial ("C&I") customers, however only the Small C&I Energy Solutions for Business Program is addressed here. (Phase V Petition, p. 12.)

In her direct testimony, OSBA Witness Angela Vitulli acknowledged that FE PA "has a good track record in serving the Small C&I customer class," and identified numerous positive attributes of FE PA's Phase V Small C&I Energy Solutions for Business Program. (OSBA St. No. 1, at 5-7.) However, OSBA Witness Vitulli raised some questions regarding the Company's ability to attain projected Small C&I savings prior to the start of Phase V and recommended that the Commission mandate that FE PA address these questions surrounding the Company's ability to achieve projected Small C&I savings prior to the start of Phase V. She also provided options for savings, such as reducing reliance on lighting for MWh savings and increasing emphasis on building shell improvements. (*Id.* at 2-3.)

The Company has agreed to decrease MWh savings from interior and exterior Small C&I lighting by 10% and commensurately increase MWh savings from other Small C&I custom, custom building improvements, air sealing, insulation offerings and/or HVAC/heat pump offerings. (Joint Petition ¶ 29.) This provision effectively addresses the matter raised by OSBA. Accordingly, this Joint Petition provision is reasonable and in the public interest and should be approved without modification.

D. TARIFF STREETLIGHTING

In her direct testimony, OCA Witness Stacy L. Sherwood contends that the lighting markets for residential and streetlighting “have matured and indicate that program intervention is not necessary for customers to adopt LEDs.” (OCA St. No. 1 at 16.) Accordingly, she recommends that the Company eliminate the residential lighting and streetlighting measures and invest those funds in “longer-lived” savings, such as weatherization measures on the residential and commercial sides respectively. (*Id.*) OCA Witness Sherwood further remarked that with elimination of the streetlighting measures, the Company should no longer assess a streetlighting surcharge related to Act 129. (*Id.*) The Company responded to OCA’s testimony noting that it believed its Phase V Plan appropriately contains streetlighting measures and therefore there will still be a Phase V streetlight rate to recover program costs. (FE PA St. No. 2R at 2.) Because cost causation requires the costs incurred to be recovered from the same customer class that benefited from the programs provided, elimination of the streetlighting measures is not feasible. (*Id.*) Furthermore, as discussed in the Company’s direct testimony and reaffirmed in rebuttal testimony, retention of the streetlighting rate is also necessary and appropriate because there are outstanding Phase IV program costs to recover. (FE PA St. No. 2 at 11; FE PA St. No. 2R at 2.)

The Joint Petition reflects a reasonable compromise of the parties’ positions on these issues. Specifically, the Joint Petition provides that the Company will remove participation and incentives for tariff streetlighting measures and reallocate the incentive budgets to target equivalent increases in MWh and Megawatt (“MW”) savings from the Custom and/or the Energy Management program components in the aggregate, over the proposed Plan targets, based on available program funds. The Company will maintain a one-year reconciliation rate for Phase IV costs for the Streetlighting class. After that, any remaining balance will be transferred to the

Commercial class. (Joint Petition ¶ 30.) Accordingly, this Joint Petition provision is reasonable and in the public interest and should be approved without modification.

E. DAILY LOAD SHIFTING AND PEAK DEMAND REDUCTION

In his direct testimony, OSBA Witness Daniel Kaufman recommended that the Company should provide further evidence that the Peak Demand Reduction (“PDR”) targets are achievable prior to the Commission approving the Plan,” and further recommended that “different incentive levels be specified and tested as the program is rolled out to understand how different incentives affect participant recruitment and retention.” (OSBA St. No. 2 at 9.) OCA Witness Sherwood recommended that Daily Load Shifting (“DLS”) and PDR efforts be removed from the portfolio prior to approval and suggested that the PDR ramp up period is not adequate. (OCA St. No. 1 at 29 and 32.)

The Company disagreed with this position, noting that to ensure its projections were reasonable, it had met with and solicited input from experienced demand response providers which included information regarding projected participation by year and ramp up, projected demand reductions and incentive structures and amounts. (FE PA St. No. 1R at 9-10.) Additionally, the Company noted that it had also reviewed the Demand Reduction Potential Study, which explicitly considered achievable demand reductions and the ramp up period. (*Id.*) Importantly, the Company’s Plan projections for DLS and PDR are well below the amounts in the Demand Reduction Potential Study that informed the demand reduction targets. (*Id.*) Finally, the Company noted that OSBA provided no evidence of the impact of removing, limiting, or altering these program offerings or allocating the budgets from them elsewhere would have on the Company’s Plan and its ability to meet the Phase V targets within the set budgetary parameters. (*Id.*)

Nevertheless, to address OSBA's and OCA's concerns around the Company's DLS and PDR efforts, the Company agreed, as part of the proposed settlement, to revise its DLS and PDR program components projections for smart thermostats to 6MW to reflect a ramp up in participation and savings that also allows sufficient time for a Conservation Service Provider ("CSP") to be onboarded. (Joint Petition ¶ 31.) The Company will also revise its eligibility criteria for the DLS and PDR program components to exclude diesel and other fossil fuel backup generators, so long as such exclusion does not impede the Company's ability to meet its DLS and DR targets. (Joint Petition ¶ 32.) The Company will ensure that customers who receive incentives from the Company's DLS and PDR program components will comply with local air quality standards. (*Id.*) The Company will also annually report the number of participating customers in the DLS and PDR program components (if any) that used diesel and other fossil fuel backup generators. (*Id.*) The Company will clarify the incentive structure for the DLS and PDR program components in Appendix B Table 8: Eligible Measures to the Plan, by technology and that the incentive structure will be based on industry experience. (Joint Petition ¶ 33.) The Company will also work with its evaluation, measurement and verification CSP, implementation CSP and the Statewide Evaluator to develop interim measure protocols for DLS and PDR and to conduct seasonal reviews of relevant data in the Company's tracking system (e.g., participation, opt-out rates, summer and winter peak load reductions). (*Id.*) Lastly, the Company will review the performance of its DLS and PDR program performance in stakeholder meetings. (*Id.*)

As such, these Joint Petition provisions are reasonable and in the public interest and should be approved without modification.

F. MULTIFAMILY PROGRAMMING

OSBA Witness Vitulli recommended that the Commission mandate the Company to plan, track, and report on projected and actual resources dedicated to the Multifamily (“MF”) sector. Specifically, she recommended that MF expenditure and participation rates be tracked and reported separately from small businesses versus MF buildings participating in the small C&I program. (OSBA St. No. 1, at 2.) CAUSE-PA Witness Grevatt took issue with the level of detail the Company provided in its Plan and recommended that the Company “develop and disseminate clear information to [MF] property managers regarding the measures and incentives that will be available to them to improve the energy efficiency of their properties.” (CAUSE-PA St. No. 1, at 39-41.)

In response to OSBA and CAUSE-PA’s concerns, the Company noted that its Plan was designed in compliance with the Commission’s Phase V EE&C Plan Template for tracking and reporting issued by Secretarial Letter dated September 8, 2025 (Docket No. M-2025-3052826).² (FE PA St. No. 1R at 15-16.) The Company further highlighted that use of these standard templates provides consistency on a state-wide basis in the information and data that is provided in both the EDC plans and reports supporting their review and any additional analysis associated with the EDCs’ plans. (*Id.*) This also ensures the continued consistency in the EDC Annual Reports providing information to all stakeholders across the state and avoids disrupting or creating inconsistencies and confusion with tracking and reporting requirements and the information being presented. (*Id.*)

² Implementation of Act 129 of 2008 - Phase V Energy Efficiency and Conservation Plan Template, Docket No. M-2025-3052826 (Secretarial Letter dated Sept. 8, 2025).

The Joint Petition contains several provisions developed by the parties to address concerns raised by CAUSE-PA and OSBA regarding MF programs outlined in the Plan, which are summarized below:

- Within 150 days of Plan approval, the Company will develop and disseminate clear information and program marketing materials to MF property managers regarding the measures, incentives, and cost sharing requirements that will be available to them to improve the energy efficiency of their properties. The Company has agreed to share this information and program marketing materials with the parties at stakeholder meetings.
- Within 150 days of Plan approval, the Company will review its landlord consent protocols with its Phase V implementation CSP and convene a meeting with interested parties and other interested stakeholders to discuss any additional measures or delivery mechanisms that would allow tenants to benefit from Act 129 programming where landlord approval is not required.
- The Company will clarify the incentive structure for the MF Program components by measure type in Appendix B Table 8: Eligible Measures. Specifically, for master metered and individually metered MF buildings, the Company will provide an enhanced incentive of up to 80% in common areas and 100% in low-income tenant spaces. Individually metered tenant units in MF buildings will be eligible for the same incentives available through the residential or low-income programs, depending on whether the building meets the low-income occupant threshold.
- The Company will cover up to 80% of the cost of an American Society of Heating, Refrigerating and Air-Conditioning Engineers Level 2 Audit with the Pennsylvania Department of Environmental Protection (“DEP”) for MF buildings that participate in DEP’s Home Energy Rebate Program if the project is likely to result in significant electric savings that could be claimed through the Commission’s 100% attribution rule in its Implementation Order.
- If at least 50% of the occupants of a MF building have household income at or below 150% Federal Poverty Line, the entire building will qualify for enhanced incentives.
- The Company will work with interested parties to develop a list of low income housing programs that will be considered categorically eligible for enhanced incentives through the Low Income MF Program. Within 150 days of Plan approval, the Company will file a compliance letter with the Commission identifying the housing programs that will qualify for categorical eligibility.

(Joint Petition ¶¶ 34-39.) These provisions balance the interests of the parties; thus, the Joint Petition provisions are reasonable and in the public interest and should be approved without modification.

G. FRONT OF THE METER (“FTM”)

Several parties provided comments regarding the Company’s proposed FTM program components. OCA Witness Sherwood recommended that “[t]he Company should be assessing for system efficiencies that promote energy savings and demand reductions in its delivery system, without being incentivized by the Act 129 funds. If the opportunities arise, then the Company should request a change to its Plan.” (OCA St. No. 1 at 33.) OSBA Witness Kaufman recommended that “[i]f FirstEnergy adds FTM measures to the Phase V Plan, it will propose a plan change using either the Commission’s standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission’s Minor Plan Change Order” and “[t]he assignment of costs to the correct class should be a condition for the Commission’s approval of the Plan.” (OSBA St. No. 2, at 3 and 14-16.) Lastly, CAUSE-PA Witness Grevatt recommended that “the Commission reject FE PA’s FTM proposal outright because it will not cause any new benefits for ratepayers other than those that are already in the works in the Company’s distribution system plans.” (CAUSE-PA St. No. 1 at 10.)

The Company disagrees with these positions. Including FTM measures under the Company’s Phase V Plan will add additional evaluation of energy and demand savings into the process of designing and implementing FTM projects and therefore support continuing and increasing awareness of the benefits of energy efficiency and demand reductions into the Company’s operations in support of improving resource adequacy in the Commonwealth. (FE PA St. No. 1R at 19-20.) Additionally, some of these FTM measures are no different than measures

that could be implemented at a customer's facility, such as substation and distribution upgrades, and as such are recognized as being able to produce viable savings. (*Id.*) Furthermore, the budget is limited to the EE&C's team engagement and other EE&C administrative activities associated with including FTM projects in the Company's Plan and the assignment of costs and savings to specific customer classes is based on well-accepted rate making principles. (*Id.*)

Under the Joint Petition, the Company will assign FTM savings and costs to the appropriate customer classes based on energy savings, except that no FTM savings or will be assigned or allocated to the low income customer savings carve-out requirement, and no costs will be assigned to the low income customer programs. (Joint Petition ¶ 40.) The Company will also review FTM measures that it identifies to include in its Phase V Plan, including costs, projected energy and demand savings by sector and EM&V protocols, with interested parties ninety (90) days prior to their implementation during Phase V, and will consider and respond to any comments provided by the parties. (Joint Petition ¶ 41.) Because this Joint Petition provision addresses the parties' concerns and interests, it is reasonable and in the public interest and should be approved without modification.

H. TRACKING AND REPORTING, PROGRAM COORDINATION, AND STAKEHOLDER MEETINGS

Several parties provided recommendations for tracking and reporting requirements and other general administrative requirements. OSBA Witness Vitulli recommended the Company set "small C&I targets for small business participation based on number of unique customers served rather than aggregate measures installed," that the Company "plan, track, and report on projected and actual resources dedicated to the Multifamily (MF) sector as a subset of resources dedicated to the different rate classes," and that "MF expenditure and participation rates should be tracked

and reported separately from small businesses versus multi-family buildings participating in the small C&I program.” (OSBA St. No. 1 at 2.).

CAUSE-PA Witness Grevatt recommended the Commission reject the Company’s Plan and require the Company to revise its filing to provide “a revised Table 9 that reflects actual measure-level savings and participation estimates” and for the Company to submit with its revised Plan a supplemental Health and Safety protocol and reporting framework” including several specific reporting metrics. (CAUSE-PA St. No. 1 at 57.) He also recommended that the Commission direct the Company to “file a report of its actions and results along with its first annual report in Phase V and with each subsequent annual report” regarding coordination between Act 129, LIURP, other home repair, weatherization, and energy efficiency programs serving low-income customers. (*Id.* at 58.)

Lastly, KEEA Witness Jeaneen Zappa recommended that the Company incorporate an assessment that aligns with the Healthy Home Evaluator evaluations from the Building Performance Institute, and that contractor requirements should include Healthy Home Evaluator certification. (KEEA St. No. 1, at 13.) She also recommended that EDCs “should be required to include in their annual report with the PUC a summary of their outreach activities to each sector and “conduct a survey to track awareness of Act 129 programs and to publicly share the findings and use this information as a basis for further consideration of marketing coordination.” (KEEA St. No. 1 at 16-17.)

As discussed in Section F of this Statement, the Company stands firm that the Plan was completed in compliance with the Commission’s Phase V EE&C Plan Template for tracking and reporting, and that use of the template is most appropriate because it ensures consistency on a state-wide basis in the information and data that is provided in the EDC plans and reports

supporting their review while also ensuring continued consistency in the EDC Annual Reports which provide information to all stakeholders across the state. (FE PA St. No. 1R, at 15-16.)

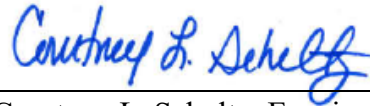
The Joint Petition contains provisions that effectively address the issues and recommendations raised by OSBA, CAUSE-PA, and KEEA regarding additional tracking and reporting and administrative requirements. The Company will implement additional measures to address OSBA, CAUSE-PA, and KEEA's concerns regarding tracking and reporting, program coordination, and stakeholder meetings as discussed more fully in the Joint Petition. (Joint Petition at ¶¶ 43-51.) As such, these Joint Petition provisions are reasonable and in the public interest and should be approved without modification.

IV. CONCLUSION

This Joint Petition achieves significant positive results, as summarized above. Each of the terms of the Joint Petition are made in consideration of the parties' various positions, concerns, and recommendations. All of the positive results of this Joint Petition are achieved after extensive discovery and submission of testimony and avoids the time and expense of further briefing and litigation. The Company believes that fair and reasonable compromises have been achieved on all issues in this case, particularly given the fact that the active parties have such diverse and competing interests in this proceeding and have reached an agreement on all issues. For all of the foregoing reasons, the Company supports the Joint Petition and respectfully requests that the Commission:

- (i) Approve the Joint Petition in its entirety and without modification; and
- (ii) Approve the Company's Phase V Plan subject to the terms and conditions of the Joint Petition.

Respectfully submitted,



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Dated: February 19, 2026

APPENDIX C

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of FirstEnergy Pennsylvania : **Docket No. M-2025-3057327**
Electric Company for Approval of a :
Phase V Energy Efficiency and :
Conservation Plan :

**STATEMENT IN SUPPORT OF THE
JOINT PETITION FOR COMPLETE SETTLEMENT
ON BEHALF OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. Introduction

The Small Business Advocate is authorized and directed to represent the interests of the small business consumers of utility services in the Commonwealth of Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50.

Pursuant to that statutory authority, the Office of Small Business Advocate (“OSBA”) filed a notice of intervention in response to the Petition of FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) for Approval of its Act 129 Phase V Energy Efficiency and Conservation (“EE&C”) Plan with the Pennsylvania Public Utility Commission (“Commission”) on November 26, 2025.

The OSBA actively participated in the negotiations that led to the proposed settlement and is a signatory to the Joint Petition for Complete Settlement (“*Joint Petition*”). The *Joint Petition* addresses the issues raised by this office in this proceeding. Therefore, the OSBA submits this statement in support of the *Joint Petition*.

II. Standards for Approval of Settlement

Section 5.231(a) of the Commission’s regulations, 52 Pa. Code § 5.231(a) (Formal Proceedings; Hearings; Settlement and Stipulations; Offers of Settlement) states, as follows:

It is the policy of the Commission to encourage settlements.

Similarly, Section 69.401 of the Commission's regulations, 52 Pa. Code § 69.104

(Settlement Guidelines and Procedures for Major Rate Cases – Statement of Policy; General)

states, as follows:

In the Commission's judgment, the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding.

III. Settlement Terms

As set forth in the *Joint Petition*, the OSBA negotiated several important concessions that will protect the interests of FE PA's small businesses.

A. Participation Tracking and Reporting

The *Joint Petition* requires FE PA to report Small C&I participation in terms of numbers of small business served,¹ which is the meaningful metric for tracking participation. FE PA's originally filed proposal was to only track the number of "measures" installed, which is not meaningful because one lightbulb can equal one "measure." This metric was inappropriate as small business customers participating in an EE&C program typically receive multiple measures through their participation.

B. Lighting Savings

The originally filed FE PA proposal assumed that the Company would attain 64% of all remaining lighting energy savings technically available within the Small C&I sector in FE PA's territory. This was optimistic because there are many economic barriers to achieving 64% of technical potential. The *Joint Petition* requires the Company to decrease MWh savings from

¹ *Joint Petition*, Paragraph 43.

Small C&I lighting by 10% and commensurately increase MWh savings from other Small C&I measures which have better potential for cost-effective energy savings, including small business custom programs, HVAC, insulation, and air sealing.²

C. Front of the Meter Program

1. Assignment of Costs

The *Joint Petition* requires FE PA to assign the Front of the Meter program's savings and costs to the appropriate customer classes based on energy savings. This will help ensure that small businesses only bear the cost of EE&C measures that benefit them.³

2. Communication

The *Joint Petition* requires FE PA to communicate any new EE&C measures that they identify (including costs and benefits) at least 60 days prior to implementation and to respond to any comments provided by the parties.⁴

D. Daily Load Shifting/Demand Response Program Protections

FE PA proposed a new Daily Load Shifting/Demand Response program in this proceeding. The OSBA negotiated additional protections for small businesses for this new program.

1. Eligibility and Reporting

The *Joint Petition* requires FE PA to exclude the use of backup diesel generators (unless necessary to meet their Plan targets) and to report annually the number of customers who use

² *Joint Petition*, Paragraph 29.

³ *Joint Petition*, Paragraph 40.

⁴ *Joint Petition*, Paragraph 41.

diesel generation.⁵ This provision will encourage demand response opportunities that are accessible to small businesses and protect local air quality.

2. Measurement Protocols

FE PA agreed to develop more robust measurement protocols.⁶ This will provide greater transparency while ensuring a more accurate assessment of whether the new EE&C program benefits C&I customers as intended.

IV. Conclusion

Therefore, for the reasons set forth in the *Joint Petition*, as well as the issue set forth in this statement, the OSBA supports the proposed *Joint Petition* and respectfully requests that the ALJ and the Commission approve the *Joint Petition* in its entirety.

Respectfully submitted,

/s/ Rebecca Lyttle

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Dated: February 19, 2026

⁵ *Joint Petition*, Paragraph 32.

⁶ *Joint Petition*, Paragraph 33.

APPENDIX D

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Approval of the Phase V Energy :
Efficiency and Conservation Plan of : Docket No. M-2025-3057327
FirstEnergy Pennsylvania Electric Company :

**STATEMENT IN SUPPORT OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

The Med-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups"), by and through their counsel, submit that the Joint Petition for Complete Settlement ("Joint Petition" or "Settlement"), filed in the above-captioned proceeding, is in the public interest and represents a fair, just, and reasonable resolution of FirstEnergy Pennsylvania Electric Company's ("FE PA" or "Company") Petition for approval of its Act 129 Phase V Energy Efficiency and Conservation ("EE&C") Plan ("Petition" or "Phase V Plan"). As a result of settlement discussions, the Company, the Industrial Customer Groups, the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), and the Keystone Energy Efficiency Alliance ("KEEA") (collectively, "Parties" or "Joint Petitioners") have agreed upon the terms embodied in the foregoing Settlement. The Industrial Customer Groups offer this Statement in Support to further demonstrate that the Settlement is in the public interest and should be approved without modification.

I. BACKGROUND

1. On November 26, 2025, FE PA filed with the Commission the aforementioned Petition. Specifically, the Petition outlined the Company's proposal to address the requirements

of Act 129 and the Commission's Phase V Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826.

2. On December 18, 2025, the Industrial Customer Groups filed a Joint Petition to Intervene to the Company's Petition. The Industrial Customer Groups are *ad hoc* associations of energy-intensive customers receiving electric service in the Company's service territory. As some of FE PA's largest customers, whose manufacturing and operational processes require significant amounts of electricity, any proposed modifications to the Company's electric rates could significantly impact the Industrial Customer Groups' production and operational costs.

3. A Prehearing Conference was held on January 6, 2026, before Administrative Law Judge ("ALJ") Alphonso Arnold III. A procedural schedule was established for discovery, written testimony, settlement discussions, and hearings.

4. On January 29, 2026, the Parties informed the ALJ that a settlement in principle had been reached on all issues in this proceeding.

II. STATEMENT IN SUPPORT

6. The Commission has a strong policy favoring settlements. As set forth in the PUC's Regulations, "[t]he Commission encourages parties to seek negotiated settlements of contested proceedings in lieu of incurring the time, expense, and uncertainty of litigation." 52 Pa. Code § 69.391; *see also* 52 Pa. Code § 5.231. Consistent with the Commission's policy, the Joint Petitioners engaged in negotiations to resolve the issues raised by various parties. These ongoing discussions produced the foregoing Settlement.

7. The Joint Petitioners agree that approval of the proposed Settlement is in the best interest of the parties involved.

8. The Settlement is in the public interest for the following reasons:
 - a. As a result of the Settlement, expenses incurred by the Joint Petitioners and the Commission for completing this proceeding will be substantially less than they would have been if the proceeding had been fully litigated.
 - b. Uncertainties regarding further expenses associated with possible appeals from the Final Order of the Commission are avoided as a result of the Settlement.
 - c. The Settlement results in terms and provisions that present a just and reasonable resolution of the Company's proposed Phase V Plan.
 - d. The Settlement reflects compromises on all sides presented without prejudice to any position any Joint Petitioner may have advanced so far in this proceeding. Similarly, the Settlement is presented without prejudice to any position any party may advance in future proceedings involving the Company.

9. The Settlement also revises the eligibility criteria for the Daily Load Shifting ("DLS") and Peak Demand Reduction ("PDR") programs to exclude diesel and other fossil fuel backup generators, so long as such exclusion does not impede FE PA's ability to meet its DLS and PDR targets. *See* Settlement, ¶ 32. In addition, the Settlement clarifies the incentive structure for these programs and provides that FE PA will work with its Conservation Service Providers ("CSPs") and the Statewide Evaluator to develop protocols and conduct seasonal reviews of relevant data. *Id.*, ¶ 33. Furthermore, FE PA agrees to review the performance of its DLS and PDR programs during meetings with stakeholders. *Id.*

10. The Industrial Customer Groups support the Settlement because it is in the public interest; however, in the event that the Settlement is rejected by the ALJ or the Commission, the Industrial Customer Groups will resume their litigation position, which may differ from the terms of the Settlement.

11. As set forth above, the Industrial Customer Groups submit that the Settlement is in the public interest and adheres to the Commission's policies promoting negotiated settlements.

The parties achieved the Settlement after settlement discussions including all active parties. While the Joint Petitioners have invested time and resources in the negotiation of the Settlement, this process has allowed the Parties, and the Commission, to avoid expending the substantial resources that would have been required to fully litigate this proceeding while still reaching a just, reasonable, and non-discriminatory result. The Joint Petitioners have thus reached an amicable resolution to this dispute as embodied in the Settlement. Approval of the Settlement will permit the Commission and Joint Petitioners to avoid incurring the additional time, expenses, and uncertainty of litigating the issues in this proceeding. *See* 52 Pa. Code § 69.391.

III. CONCLUSION

WHEREFORE, the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, and the West Penn Power Industrial Intervenors respectfully request that the Pennsylvania Public Utility Commission approve the Joint Petition for Settlement submitted in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: February 19, 2026

APPENDIX E

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania	:	
Electric Company for Approval of a	:	
Phase V Energy Efficiency and	:	Docket No. M-2025-3057327
Conservation Plan	:	

**STATEMENT OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA IN SUPPORT OF THE JOINT
PETITION FOR COMPLETE SETTLEMENT**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), a signatory party to the Joint Petition for Complete Settlement (“Joint Petition” or “Settlement”), respectfully requests that the terms and conditions of the Settlement be approved by the Honorable Administrative Law Judge Alphonso Arnold III (“ALJ”) and the Pennsylvania Public Utility Commission (“Commission”) without modification. For the reasons stated more fully below, CAUSE-PA believes that the terms and conditions of the Settlement are in the public interest, are consistent with the Commission’s Phase V Final Implementation Order¹, and should be approved without modification.

¹ Act 129 Energy Efficiency and Conservation Program, M-2025-3052826, Final Implementation Order (June 18, 2025) (hereinafter “Ph. V Implementation Order”).

I. INTRODUCTION

CAUSE-PA intervened in this proceeding to ensure that the Act 129 Phase V Energy Efficiency and Conservation Plan of FirstEnergy Pennsylvania Electric Company (“FirstEnergy” or “FE PA” or “Company”) is appropriately designed to provide meaningful access to energy efficiency measures that deliver appreciable electricity and bill savings for low income customers and other vulnerable consumer groups, consistent with Act 129 and the Commission’s Phase V Final Implementation Order. The Settlement, which was arrived at through good faith negotiation by all parties, is in the public interest in that it addresses issues of concern to CAUSE-PA, balances the interests of the parties, and fairly resolves a number of important issues in the proceeding. If approved, the Settlement will avoid substantial litigation and associated costs and will eliminate the possibility of further Commission litigation and appeals, along with their attendant costs. As such, we assert that the Settlement should be approved without modification.

II. BACKGROUND

CAUSE-PA adopts the background as set forth in Paragraphs 1-20 of the Joint Petition. By way of further background, CAUSE-PA submitted the expert testimony of Mr. Jim Grevatt in this proceeding, analyzing the details of FirstEnergy’s proposed Phase V low-income programming and its alignment with the Commission’s Phase V Implementation Order and other important policy goals and objectives. (CAUSE-PA St. 1).

Through testimony, Mr. Grevatt explained that FirstEnergy serves a substantial number of low-income customers who are unable to afford utility service and are in dire need of energy efficiency programs that deliver deep electricity savings to help control their usage and, in turn, reduce their monthly electric bills. (*Id.* at 16-27). FirstEnergy estimates that approximately 23.6% (426,858) of its residential customers had low income in 2024. (*Id.* at 17). FirstEnergy’s low-

income customers have disproportionate energy burdens and terminations rates, as well as a far higher rate of payment trouble than residential customers overall. (Id. at 18, 20-21). Notably, FirstEnergy's low-income customers were terminated at a rate of 21.6% (Id. at 21). As Mr. Grevatt explained, low income households are more likely to live in energy inefficient homes, further compounding energy unaffordability and underscoring the dire need for comprehensive energy efficiency and conservation services for low income households to provide meaningful bill savings. (Id. at 24-26).

In reviewing FirstEnergy's proposed Phase V low-income programming, Mr. Grevatt explained that in its proposed Plan, the Company placed too little emphasis on deep savings measures and projects such as heat pumps, heat pump water heaters, and building shell measures, and planned to achieve too much of its low income savings target through shallow savings measures such as behavioral programming, appliance recycling, lighting, and other low-impact measures. (Id. at 7, 27-39). As he explained, this was inconsistent with the Commission's Phase V Final Implementation Order and undermined the Commission's important and explicit goal to ensure that Phase V programming delivers more comprehensive measures to consumers. (Id. at 28; Phase V Implementation Order at 11). Mr. Grevatt indicated that FirstEnergy's proposed multifamily offerings lacked the clarity necessary to make program participation practicable for multifamily housing providers. (Id. at 39-41). Mr. Grevatt explained that FirstEnergy's proposed approach to addressing health and safety barriers was insufficient to ensure that the Company can deliver deep savings measures to low-income customers in need of health and safety remediation. (Id. at 43-45). Further, Mr. Grevatt identified that FirstEnergy's proposed plan failed to integrate meaningful coordination with external home repair, weatherization, and energy efficiency programs that would enable the Company to deliver more comprehensive services to its customers.

(Id. at 46-49). Finally, Mr. Grevatt explained that the Front-of-the-Meter (FTM) proposal in the Company's proposed Plan lacked the detail and specificity the Commission's Order required. (Id. at 51-53).

To address the issues identified with FirstEnergy's proposed Phase V programming for low-income consumers, Mr. Grevatt set out several recommendations for how FirstEnergy could improve its program design and delivery of services to this uniquely vulnerable population. (See Id. at 56-58).

III. CAUSE-PA SUPPORT FOR THE SETTLEMENT

The following terms of the Settlement address issues of concern raised by CAUSE-PA, as explained in Mr. Grevatt's testimony, and reflect a carefully balanced compromise of the varied interests in this proceeding. As such, CAUSE-PA urges ALJ Arnold and the Commission to approve the Settlement without modification.

1. Additional Focus on Comprehensive Measures

The Settlement provides that the Company will reduce projected MWh savings from its Low-Income Behavioral program and the LED Linear, Smart Strip Plug Outlets, and Air Purifier/Cleaner measures in its Low-Income Products program component by 2,500 MWh in the aggregate and target an equivalent 2,500 MWh increase in savings through deep savings measures including heat pumps, heat pump water heaters, and building insulation and air sealing measures. (Joint Petition at ¶ 24). The Settlement also provides that the Company will shift 650 MWh of projected savings from the Residential Behavioral program component into the Residential Comprehensive Audits and Residential Multifamily program components. (Joint Petition at ¶ 23). In the non-residential sector, the Company will decrease MWh savings from interior and exterior Small Commercial and Industrial lighting by 10% and commensurately increase MWh savings

from other Small Commercial and Industrial custom, custom building improvements, air sealing, insulation offerings and/or HVAC/heat pump offerings. (Joint Petition at ¶ 29).

CAUSE-PA asserts that these provisions represent a reasonable compromise that appropriately balances the interests of the parties and interested stakeholders. As noted above, Mr. Grevatt explained in testimony that the Company's plan, as proposed, placed too little focus on deep savings measures and too much focus on shallow savings measures that do not produce lasting and meaningful electricity and bill savings for low income consumers. (CAUSE-PA St. 1 at 7, 27-39). The Settlement fairly addresses this concern, in balance with the other issues and interests in this proceeding, because it requires the Company to measurably increase its reliance on deep savings measures to achieve its targets, especially its low income savings target.

2. Clarity Regarding Low-Income Multifamily Offerings

The Settlement provides that the Company will clarify the incentive structure for its low-income multifamily program components. (Joint Petition at ¶ 34-39). Specifically, the Petition provides that the Company will indicate in its Plan that the low-income multifamily programs will provide incentives covering up to 80% of costs in multifamily common areas and 100% in low-income tenant spaces. (Joint Petition at ¶ 36). The Settlement further provides that the Company will cover up to 80% of the costs of an ASHRAE Level 2 Audit co-funded with the Home Energy Rebates program to be implemented by the Pennsylvania Department of Environmental Protection (DEP). (Joint Petition at ¶ 37). The Settlement provides for a clear eligibility threshold for low-income multifamily housing and commits the Company to developing a list of low-income housing programs that will be categorically eligible for the Company's low-income multifamily program services. (Joint Petition at ¶¶ 38, 39). Further, the Settlement provides that the Company will develop program marketing materials to promote the Plan's offerings to multifamily housing

providers regarding the measures, incentives, and cost sharing requirements that will be available to them, and will review its landlord consent protocols to explore measures that could allow tenants to participate in Act 129 programming where landlord approval cannot be secured. (Joint Petition at ¶¶ 34-35).

As Mr. Grevatt explained in testimony, the Company's proposed Plan as filed lacked the clarity regarding its multifamily program offerings necessary to encourage the participation of multifamily housing providers. (CAUSE-PA St. 1 at 39-41). Mr. Grevatt also explained that the Company's proposed Plan prevented tenants from receiving any program services without landlord authorization. (*Id.* at 42). The Settlement fairly addresses these concerns, in balance with the other issues and interests in this proceeding, because it requires the Company to clarify and promote its multifamily program offerings and to explore participation pathways for tenants where landlord approval cannot be secured. Clarity regarding cost share for multifamily housing providers will promote program uptake and facilitate the delivery of energy efficiency improvements for low-income tenants.

3. Improved Process for Remediating Health and Safety Barriers

The Settlement provides that the Company will commit to target spending at least \$600,000 per year on health and safety remediation to enable the delivery of deep savings measures to low-income customers. (Joint Petition at ¶ 26). The Settlement further provides that the Company will pursue health and safety remediation in coordination with other programs and will develop a description of protocols and processes for tracking and following up with referrals to other programs to minimize customer deferrals. (Joint Petition at ¶ 25). The Company will cover up to 50% of the total weatherization measure cost, when the cost and energy savings attributable to the

remediation meet program component acquisition cost and devise and implement a process for tracking and following up on health and safety referrals to reduce the number of deferrals. (Id.).

As Mr. Grevatt explained in testimony, the Company's proposed approach to addressing health and safety remediation in its Plan as filed was insufficient to ensure low-income customers living in homes with health and safety issues could receive deep savings measures through the Company's programming. (CAUSE-PA St. 1 at 43-45). The Settlement fairly addresses this concern, in balance with the other issues and interests in this proceeding, because it requires the Company to develop a clear protocol for remediating health and safety issues internally or in coordination with other programs.

4. Enhanced Program Coordination

The Settlement also provides that the Company will convene meetings at least annually with Natural Gas Distribution Companies, LIURP providers, Weatherization Assistance Program providers, home preservation program providers, DEP, and other stakeholders, including interested parties to this proceeding, to identify steps to improve program coordination. (Joint Petition at ¶ 49). These meetings will, at minimum, address implementing recommendations arising from the Commission's data sharing working group, streamlined referral processes, and coordinated measure delivery. (Id.).

As Mr. Grevatt explained in his testimony, the Company's proposed Plan as filed lacked detail regarding coordination of services with other program providers. (CAUSE-PA St. 1 at 46-49). The Settlement fairly addresses this concern, in balance with the other issues and interests in this proceeding, because it requires the Company to meet with other program implementers to discuss further steps toward greater coordination.

5. Improved Transparency Regarding FTM Proposals

The Settlement provides that the Company will review any FTM proposal with interested parties, and will consider and respond to the parties' written comments prior to implementation. (Joint Petition at ¶ 41). The Settlement further provides that the Company will assign any FTM savings and costs to the appropriate customer classes based on energy savings and will not allocate any FTM savings toward the Company's low income savings target and no costs will be assigned to the low-income customer programs. (Joint Petition at ¶ 40). The Settlement also explicitly provides that the parties' agreement to these provisions does not constitute agreement as to the prudence or cost-effectiveness of any proposed FTM program, and reserves the parties' respective right to challenge any FTM program in an appropriate filing or in subsequent phases. (Joint Petition at ¶ 42).

In its Final Implementation Order, the Commission explained that FTM measures "generally do not involve ratepayer participation or even awareness." (Ph. V Implementation Order at 77). In its Tentative Implementation Order, the Commission noted its view that FTM measures are "part of operating the distribution system rather than an EE&C Plan component." (Tentative Phase V Implementation Order at 30). Although the Commission ultimately allowed EDCs to include FTM measures in EE&C plans through the Final Implementation Order, it required that EDCs limit any FTM measures to no more than 10% of portfolio savings targets, and through its Final Phase V Plan Template, required EDCs to describe any FTM measure to be included in EDCs' plans. (Ph. V Implementation Order at 77; Final Phase V Plan Template at 3.1.6).

As Mr. Grevatt explained in testimony, savings methodologies for FTM measures are not widely uniform and accepted across the industry. (CAUSE-PA St. 1 at 52-53). Mr. Grevatt

highlighted that the Maryland Public Service Commission adopted the recommendation of a 2024 Conservation Voltage Reduction (CVR) Working Group to exclude CVR impacts from the Commission's goal setting process due to the use of out-of-date CVR savings methodologies. (Id.). Further, Mr. Grevatt explained in his testimony, the Company's proposed Plan as filed lacked the detail and specificity regarding FTM proposals that the Commission's Order required. (CAUSE-PA St. 1 at 51-53). The Settlement fairly addresses this concern, in balance with the other issues and interests in this proceeding, because it requires the Company to provide information about any FTM proposals to interested parties prior to implementation and reserves the right of the parties to later challenge any FTM proposals in appropriate filings.

6. Continuity of Low-Income Programming

The Settlement provides that the Company will strive to continue implementing its low-income programming through Phase V even if it reaches its low-income savings target before the end of the Phase. (Joint Petition at ¶ 27). The Settlement further provides that the Company will notify the parties if it projects the low-income budget to be exhausted and will consider reallocating funding from other programs to continue funding the low-income program if necessary. (Id.). In testimony, Mr. Grevatt identified that during Phase IV, the Company closed the low-income program in the Penn Power rate district despite projecting to end the Phase with over \$1.2 million in unspent funds in other program budgets. (CAUSE-PA St. 1 at 55-56). The Settlement addresses this concern, in balance with the other issues and interests in this proceeding, because it commits the Company to strive to continue its low-income programming through the Phase and to notify stakeholders and consider reallocation of funds from other programs if it expects the budget to be exhausted.

7. Tracking and Reporting

The Settlement also provides a number of metrics that the Company will track and report throughout Phase V. These include:

- Unique customer participation in its Small and Large Commercial and Industrial program components in its Annual Reports consistent with the Commission's reporting templates established for Phase V. (Joint Petition at ¶ 43).
- Customer participation in the Company's Plan consistent with the reporting templates established for Phase V. (Joint Petition at ¶ 44).
- Participation and expenditures for multi-family buildings and other businesses in its Annual Reports consistent with the Commission's reporting templates established for Phase V. (Joint Petition at ¶ 46).
- Customer participation and demand savings of its DLS and PDR program components in its Annual Reports consistent with the Commission's reporting templates established for Phase V. (Joint Petition at ¶ 47).
- Health and Safety remediation in its annual reports consistent with the Commission's reporting templates established for Phase V. (Joint Petition at ¶ 48).

The Company will also assess cross-participation by Home Energy Report recipients in other residential energy efficiency programs through evaluation of the program and will leverage this information to encourage participation in other residential programs. (Joint Petition at ¶ 28).

Tracking and reporting these metrics will improve the ability of the Company, the Commission, and stakeholders to understand and evaluate the Company's progress in achieving the goals in its plan and the terms of this Settlement. Thus, these terms are just and reasonable and should be approved.

IV. CONCLUSION

CAUSE-PA submits that the proposed Settlement, which was achieved by the Joint Petitioners after an investigation of the Company's filing, is in the public interest and should be approved. Acceptance of the Settlement avoids the necessity of further administrative and possibly appellate proceedings regarding the settled issues at what would have been a substantial cost to the Joint Petitioners and the Company's customers. Accordingly, CAUSE-PA respectfully requests that ALJ Arnold and the Commission approve the Settlement without modification.

Respectfully submitted,
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APPENDIX F

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania :
Electric Company For Approval of Its : Docket No. M-2025-3057328
Act 129 Phase V Energy Efficiency and :
Conservation Plan :

**STATEMENT OF THE KEYSTONE ENERGY EFFICIENCY ALLIANCE IN SUPPORT
OF JOINT PETITION FOR FULL SETTLEMENT**

The Keystone Energy Efficiency Alliance (KEEA), one of the signatory parties to the Joint Petition for Approval of Full Settlement (Joint Petition), finds the terms and conditions of the Settlement to be in the public interest, and therefore respectfully requests that the terms and conditions of the be approved by the Honorable Administrative Law Judge Alphonso Arnold III and the Pennsylvania Public Utility Commission without modification.

I. INTRODUCTION

On December 1, 2025, FirstEnergy Pennsylvania Electric Company (FirstEnergy) filed its Petition for Approval of its Phase V Energy Efficiency and Conservation (EE&C) Plan at the above-captioned docket. KEEA intervened in this proceeding to ensure that FirstEnergy's Phase V EE&C Plan is appropriately designed to provide meaningful, cost-effective energy efficiency measures. KEEA actively engaged in settlement negotiations with the other parties, and the proposed settlement adequately addresses the concerns raised in the direct testimony of Jeaneen Zappa.

II. SETTLEMENT TERMS

KEEA negotiated several important provisions presented in the Joint Petition that will improve the effectiveness of FirstEnergy's EE&C programs.

First, the Joint Petition adds health and safety remediation to FirstEnergy's Residential and Residential Low-Income programs. Specifically, FirstEnergy agrees to spend at least

\$600,000 per year of its Act 129 Low-Income Energy Efficiency Program budget to address health and safety barriers to weatherization upgrades, as well as to coordinate its remediation efforts with other available programs. This health and safety remediation is essential to enabling effective weatherization upgrades in for low-income customers, who are often deferred from such programming due to the condition of their homes.

Second, FirstEnergy has agreed to cover up to 80% of the cost of an ASHRAE Level 2 Audit with the Pennsylvania Department of Environmental Protection (DEP) for multifamily buildings that participate in DEP's Home Energy Rebate Program. Multifamily customers are traditionally underserved, and lessening the cost barrier for an audit should help to overcome some of the historical underinvestment in this sector.

Third, FirstEnergy has agreed to convene program coordination meetings with other interested partners, including Natural Gas Distribution Companies with overlapping service territories, LIURP providers, Weatherization Assistance Program providers, home preservation program providers, DEP, as well as stakeholders to include interested parties to this proceeding.

III. CONCLUSION

For the reasons set forth in the Joint Petition, as well as those set forth in this statement, KEEA supports the proposed Joint Petition and respectfully requests that the Administrative Law Judge and the Commission approve the Joint Petition in its entirety.

Respectfully submitted,

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February 19, 2026

APPENDIX G

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania	:	
Electric Company for Approval of a	:	Docket No. M-2025-3057327
Phase V Energy Efficiency and	:	
Conservation Plan	:	

STATEMENT
OF THE
OFFICE OF CONSUMER ADVOCATE
IN SUPPORT OF FULL SETTLEMENT

The Office of Consumer Advocate (OCA), one of the signatory parties to the Joint Petition for Approval of Full Settlement (Settlement), finds the terms and conditions of the Settlement to be in the public interest for the following reasons:

I. INTRODUCTION

On October 15, 2008, Act 129 of 2008 (Act 129 or the Act) was signed into law by Governor Edward G. Rendell. Act 129 made numerous amendments to Chapter 28 of the Public Utility Code and required the seven major electric distribution companies (EDCs) to file energy efficiency and conservation plans (EE&C Plans), which occurred in the summer of 2009. The Phase I Plans expired on May 31, 2013. Phase II of the EE&C Plans began on June 1, 2013, and expired on May 31, 2016. Phase III of the EE&C Plans began on June 1, 2016, and expired on May 31, 2021. Phase IV of the EE&C Plans began on June 1, 2021, and will expire on May 31, 2026. The Commission has now established the requirements and process for Phase V of the EE&C

Plans to operate from June 1, 2026, through May 31, 2030. *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (June 18, 2025) (*Phase V Implementation Order*). This proceeding concerns the Phase V Plan filing of FirstEnergy Pennsylvania Electric Company (FE, FE PA, First Energy, or Company).

The *Phase V Implementation Order* directed that each EDC meet a consumption reduction target and a demand response target. *Phase V Implementation Order* at 12. The low-income targets represent 7.1% of the statewide MWh target. *Phase V Implementation Order* at 55. Also, it established that the Company's share is 7.5% of its portfolio, which must be met through the low-income customer sector programs. *Id.* The Total Resource Cost (TRC) test will continue to be used to evaluate each EDC's EE&C Plan. *Phase V Implementation Order* at 216-217.

Act 129 caps annual spending on the Plan at 2% of the EDC's total revenues for the calendar year 2006. 66 Pa. C.S. § 2806.1(g). The Act provides for full and current cost recovery of the Plan costs through an automatic adjustment rider, but it prohibits the recovery of lost revenues by the EDC through the automatic adjustment rider. 66 Pa. C.S. § 2806.1(k). The costs incurred are to be allocated to the classes that directly benefit from the program measures implemented, unless a system wide benefit can be shown.

On December 1, 2025, First Energy filed its Phase V Energy Efficiency and Conservation Plan (Phase V Plan) with the Public Utilities Commission (Commission). On December 2, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed an Answer and Petition to Intervene. On December 15, 2025, the OCA filed a Notice of Intervention and Public Statement, and then on December 16, 2025, filed its Notice of Appearance. On December 16, 2025, the Office of Small Business Advocate (OSBA) filed its Notice of Intervention. On December 18, 2025, a Joint Petition to Intervene was filed by the Met-Ed

Industrial Users Group, Penelec Customers Alliance, and West Penn Power Industrial Intervenors (Industrial Group). On December 23, 2025, Pennsylvania State University filed a Petition to Intervene. FE PA's filing was assigned to the Office of Administrative Law Judge and further assigned to Administrative Law Judge Alphonso Arnold III for investigation. On December 29, 2025, ALJ Arnold issued Prehearing Conference instructions by and through email. On January 3, 2026, the matter was published in the *Pennsylvania Bulletin*. The Keystone Energy Efficiency Alliance (KEEA) filed a Petition to Intervene on January 6, 2026. On January 6, 2026, the telephonic Prehearing Conference was held at which time a procedural schedule was established.

Between January 6, 2026, and January 16, 2026, FE, OCA, CAUSE-PA, OSBA, the Industrial Group, Penn State University, and KEEA (Joint Petitioners) engaged in discovery while simultaneously beginning settlement discussions. On January 16, 2026, the OCA submitted the Direct Testimony of Ms. Stacy Sherwood (OCA Statement No. 1).¹ In addition to OCA, other parties including CAUSE-PA, OSBA, and KEEA filed direct testimony on January 16, 2026. The Joint Petitioners continued to engage in settlement discussions after direct testimony was filed. None of the parties filed rebuttal testimony.

An evidentiary hearing was held on January 29, 2026, wherein the parties stipulated to the admission of written testimony and exhibits and waived cross-examination of all parties' witnesses.

¹ Ms. Sherwood, a Principal with Energy Futures Group, has over 15 years of experience in energy efficiency (EE) and demand response (DR), along with expertise in automated metering infrastructure, cost recovery, renewable energy, and ratepayer safeguards for large loads such as cryptocurrency and data centers. Ms. Sherwood has reviewed plans proposed by Act 129 EDCs and voluntary utilities since Phase III on behalf of the OCA. For the last three years she has served as the lead technical consultant to the Connecticut Energy Efficiency Board on the review of the state's Conservation and Load Management Plan. She has also reviewed demand side management plans and filed comments or testimony in the following states: Connecticut, Georgia, Iowa, Kansas, Kentucky, Maryland, Missouri, Pennsylvania, South Carolina, and Wisconsin.

The Joint Petitioners participated in extensive settlement discussions which resulted in this Joint Petition for Approval of Full Settlement (Settlement). The Settlement provides for approval of FE PA's Phase V Plan with certain modifications and clarifications related to issues raised by OCA Witness Sherwood. The Settlement provides for modifications to residential and street lighting programs, commercial lighting, home energy reports, daily load shifting and peak demand reduction, and front of the meter initiatives. In addition to the issues raised by OCA Witness Sherwood, the Settlement also addresses issues related to multifamily programming, tracking and reporting of customer participation in programs, and overall program coordination. For the reasons discussed below, the OCA submits that the Settlement is in the public interest and should be adopted.

II. SUMMARY OF FILING

First Energy's Phase V Plan, as filed, includes four efficiency programs, including the Residential Solutions Program, the Low-Income Energy Efficiency Program, and the Commercial and Industrial Program (C&I) which is broken down into a Small C&I Program and Large C&I Program. FE Petition for Approval of Phase V Plan (Petition) at 10, See also Phase V Plan at 16. The Company noted in its Phase V Plan that many of the programs are an extension of measures included in the Phase IV Plan. *Id.* Over the course of the five-year Phase V Plan, these programs combine to produce a reduction in energy consumption of 1,119,031 MWh. and 292 MW of peak demand reduction. FE Phase V Plan at 25. The Phase V Plan also includes a low-income energy savings target of 88,086 MWh. *Id.*

The total projected cost of the Phase V Plan is \$390,319,523, which represents the maximum spending level permitted under the Phase V Implementation Order. *Id.* at 21; *See also* Petition at 9. First Energy has modified the Phase IV Plan components including transitioning

energy efficiency kits and school education from a program to outreach and marketing, adding a program to co-fund ASHRAE Level 2 audits in support of the Inflation Reduction Act Home Efficiency Rebates, adding residential and commercial daily load-shifting and peak demand reduction and finally adding a front of the meter component to both the residential and commercial portfolios. FE PA St. No. 1 at 13, See also OCA St. No. 1 at 3.

The OCA found that First Energy's Phase V Plan, as filed, carried significant risk of failing to achieve cost-effectiveness and the consumption and demand reduction targets established by the Commission. OCA St. No. 1 at 35. The Phase V Plan relies incorrectly on forecasted participation, short lived savings, saturated markets and programs that lack details. *Id.* at 4. The Plan includes a gross cost-effective Total Resource Cost (TRC) of 1.10 indicating that for every dollar spent there are \$1.10 in benefits. OCA St. No. 1 at 8; *See also* Phase V Plan Appendix B Table 14. While the OCA understands that the Phase V Implementation Order directs targets to be assessed in gross verified savings, to assess reasonableness of the Phase V Plan, OCA Witness Stacy Sherwood considered the net-to-gross impacts accounting for free ridership, spillover, and market efforts. OCA St. No. 1 at 9. After Ms. Sherwood adjusted for net-to-gross impacts the TRC for the FE Phase V Plan became 0.996, indicating that the Phase V Plan does not exceed the benefits calculated in the TRC test. *Id.*

The OCA found that the First Energy Phase V Plan raised significant concerns as to the ability of the Company to reasonably deliver cost-effective energy savings and demand reductions through the implementation of the Phase V Plan as submitted by First Energy.

III. LEGAL STANDARDS

The Commission's policy promotes settlements. 52 Pa. Code §§ 5.231, 69.401. In order to approve a Settlement, the Commission must determine that the proposed terms and conditions are

in the public interest. *Pa. PUC v. Philadelphia Electric Company*, 60 Pa. P.U.C. 1, 22 (1985); *Pa. PUC v. City of Bethlehem – Water Dept.*, Docket No. R-2020-3020256 (Order entered April 15, 2021) (*City of Bethlehem*) at 13 (citing *Pa. PUC v. York Water Co.*, Docket No. R-00049165 (Order entered October 4, 2004); *Pa. PUC v. C. S. Water and Sewer Assoc.*, 74 Pa. P.U.C. 767 (1991) (*CS Water and Sewer*)). “It is the Commission’s duty to determine the public interest and to protect the rights of the public.” *Duquesne Light Co. v. Pa. PUC*, 715 A.2d 540, 546 (Pa. Cmwlth. Ct. 1998) (citations omitted). The Commission recognizes that settlements represent “a compromise of the positions held by the parties of interest, which, arguably fosters and promotes the public interest.” *CS Water and Sewer*, 74 Pa. P.U.C. at 771.

Consistent with the Commission’s other statutory responsibilities, the Commission must determine the public interest with “due consideration to the interests of consumers.” 71 P.S. § 309-5 (2).

Proponents of an order bear the burden of proof. 66 Pa.C.S. § 332(a). Because the Joint Petitioners request that the Commission enter an order adopting the settlement without modification, they share the burden of proof to show that the terms and conditions of the settlement are in the public interest. 66 Pa.C.S. § 332(a); *City of Bethlehem* at 13. It is well-established that the “degree of proof before administrative tribunals as well as before most civil proceedings is satisfied by establishing a preponderance of the evidence.” *Lansberry v. Pa. PUC*, 578 A.2d 600, 602 (Pa. Cmwlth. Ct. 1990) (*Lansberry*). For a Commission decision to be supported by substantial evidence, it must be supported by such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. *Dutchland Tours, Inc. v. Pa. PUC*, 337 A.2d 922, 925 (Pa. Cmwlth. 1975) (*Dutchland*). The evidence must be substantial and legally credible, not mere “suspicion” or a “scintilla” of evidence. *Lansberry*, 578 A.2d at 602.

IV. SETTLEMENT IS IN THE PUBLIC INTEREST

The Commission encourages settlement, and to do so it must recognize the balance of compromises struck by settling parties. While the OCA does not address all issues contained within the Settlement in this Statement in Support, the OCA does not oppose terms and conditions not expressly addressed herein. The OCA submits that the Settlement, taken as a whole, is a reasonable compromise in consideration of likely litigation outcomes before the Commission. The OCA submits that the Settlement is in the public interest and supports Commission approval of the Settlement without modification. The OCA points to the substantial evidence in the record as support for the provisions addressed by the OCA below and relies on the other parties to the Settlement to address those provisions that are significant and material to them in their respective statements in support.

A. Lighting (Settlement at ¶¶ 29-30)

The Company's Phase V Plan, as filed, projected approximately 29% of its energy savings from lighting measures. OCA St. No. 1 at 13. In its filing, the Company simply stated that it would "work with participating distributors to incorporate into the application process documentation that the customer equipment being replaced is not LED." Phase V Plan at Page 155. Despite the lighting market being transformed in both the commercial and residential spheres, the Company's plan referenced "lighting" over 125 times. *See* Phase V Plan.

The OCA recognized that these measures are highly cost-effective at a gross level. *Id.* at 14. However, the OCA explained in its testimony that the market for residential lighting is matured and highly saturated. *Id.* OCA Witness Stacy Sherwood explained that the residential lighting market is saturated by referencing the 2023 Pennsylvania Statewide Act 129 Residential Baseline Study, which concluded that 59 percent of all residential sockets statewide had LED

lighting. *Id* citing the NMR Group’s 2023 Pennsylvania Statewide Act 129 Residential Baseline Study. The OCA observed that the Plan, as filed, would likely yield a result whereby residential customers will install LED lighting, without intervention from the Company, leading to reduced recognition of savings when existing LED lighting is replaced by new LED lighting. *Id* at 13. The Phase V Plan as filed had also included a street light component; however, Ms. Sherwood testified that this market has also become saturated. OCA St. No. 1 at 16.

Unlike the residential and street lighting markets that have matured, the commercial market for lighting is still maturing. OCA St. No. 1 at 14-15. OCA Witness Sherwood references the Non-Residential Baseline Study which found that the commercial lighting market had matured over the course of the past decade. *Id*. This study found that 60 percent of commercial lighting statewide and 40 percent of the total install wattage was comprised of LED technology. *Id*. However, Ms. Sherwood explained that since the state’s Non-Residential Baseline Study was completed, an additional two years had passed. *Id*. Over the course of the additional two years, commercial programs had more time to influence the lighting market, further fueling concerns that there is a risk of LED-to-LED replacements which will reduce the savings recognized by the program. *Id*.

The OCA recommended that the Company eliminate residential and street lighting measures from its portfolio and redirect those funds to longer-lived savings initiatives, such as HVAC and weatherization measures across both the residential and commercial sectors. OCA St. No. 1 at 16. Consistent with its recommendation to eliminate the street lighting program, the OCA further proposed removing the associated streetlighting surcharge. *Id*. With respect to commercial lighting, the OCA noted that the market remains in transition and recommended limiting lighting savings to no more than 20 percent of total commercial savings, with that percentage declining

annually throughout Phase V. *Id.* Any funds previously allocated to commercial lighting that are no longer needed should instead be reallocated to support commercial weatherization measures.

Id.

Despite multiple parties, including the OCA, expressing concern about the Company's reliance on lighting measures in its Plan as filed, Mr. Edward Miller responded that "lighting is recognized as a key component of, or a steppingstone for, participation in program opportunities" by way of rebuttal. FE PA St. 1-R at 11. The Joint Petitioners agreed to address some of the issues raised by OCA regarding lighting as follows:

29. The Company agrees to decrease MWh savings from interior and exterior Small C&I lighting by 10% and commensurately increase MWh savings from other Small C&I custom, custom building improvements/air sealing/insulation offerings and/or HVAC/heat pump offerings.
30. The Company agrees to remove participation and incentives for tariff streetlighting measures and to reallocate the incentive budgets to target equivalent increases in MWh and MW savings from the Custom and/or the Energy Management program components in the aggregate, over the proposed plan targets, based on available program funds. The Company will maintain a one-year reconciliation rate for Phase IV costs for the Streetlighting class. After that, any remaining balance will be transferred to the Commercial class.

(Settlement at ¶¶ 29-30).

The terms of the Settlement, as amended, will address the concerns raised by the OCA regarding the saturation of the savings seen in both the C&I market and streetlight programs. By reducing Small C&I lighting savings by 10 percent and reallocating those resources to custom, building shell, air sealing, insulation, and HVAC/heat pump offerings, the Settlement appropriately shifts investment toward longer-lived, higher-impact measures that provide more durable energy and peak demand savings. This rebalancing reflects the continued maturation of the lighting market and ensures that program funds are directed to areas with stronger incremental savings potential and greater lifecycle cost-effectiveness.

Similarly, the removal of tariff streetlighting participation and incentives, coupled with the reallocation of those budgets to Custom and Energy Management program components, strengthens the portfolio by targeting deeper, site-specific savings opportunities while maintaining equivalent MWh and MW performance. The inclusion of a one-year reconciliation rate for Phase IV Streetlighting costs further promotes rate stability and an orderly transition of any remaining balances. Taken together, these provisions enhance the long-term effectiveness, integrity, and strategic balance of the EE&C Plan while preserving overall savings objectives.

The OCA respectfully asserts that these provisions reflect a reasonable and significant compromise reached through collaboration among the parties and are necessary to support effective EE&C program implementation. The OCA appreciates these terms in addressing the concerns as outlined in Ms. Sherwood's testimony. Further, these revisions are in the public interest because they promote a more cost-effective, durable, and strategically balanced EE&C portfolio while preserving overall savings commitments. By shifting resources away from increasingly saturated lighting measures and toward longer-lived investments such as HVAC, heat pumps, custom projects, and building shell improvements, the settlement ensures that ratepayer funds are directed to measures that provide deeper, more persistent energy and peak demand reductions.

In addition, reallocating funds from tariff streetlighting to Custom and Energy Management programs supports more targeted, site-specific efficiency improvements that can deliver meaningful MW impacts and greater system benefits. The requirement to maintain equivalent MWh and MW savings safeguards overall portfolio performance, while the one-year reconciliation mechanism promotes rate stability and an orderly transition of costs. Collectively, these revisions advance prudent stewardship of ratepayer dollars, improve long-term program

effectiveness, and better align the EE&C Plan with evolving market conditions—outcomes that are squarely in the public interest. Accordingly, the OCA recommends that the Commission approve the same.

B. Home Energy Reports (HER) (Settlement at ¶ 28)

The Company planned to continue providing Home Energy Reports (“HERs”) in Phase V to its customers through the Residential Energy Solutions Program (“RESP”) and the Low Income Energy Efficiency Program (“LIEEP”). OCA St. 1 at 17. The OCA observed that, over five years, the HERs represent 30 percent of the total residential portfolio savings, and 32 percent of RESP and 22 percent of LIEEP portfolios. *Id.* The OCA explained that due to the behavioral nature of the HERs, the savings resulting from this effort are short-lived, cannot be transferred between owners, and vary based upon usage and house size. *Id.*

The OCA sought elimination of HER in the Company’s Phase V planning, explaining in its litigated position that these reports do not result in permanent physical improvements to customer homes. *Id.* Ms. Sherwood explained that HER measures do not create permanent physical improvements in homes, so their savings depend on ongoing program expenditures and lack the long-term certainty of equipment- or building envelope–based measures. *Id.* In contrast, measures like heat pumps and insulation have 15-year lifespans, offering greater lifetime savings. Additionally, because HER measures are not tied to the home itself, their savings do not persist when occupants change. *Id.*

Ms. Sherwood also explained that HER will only save a small amount of energy per household compared to comprehensive upgrades like insulation or HVAC improvements. *Id.* at 18. Because of this, these programs have limited impact on lowering overall energy bills, especially for households that already face high fixed energy costs or live in inefficient buildings.

Id. Additionally, the energy savings from these programs are often concentrated among higher-usage households, which means the benefits may not be distributed evenly across different income levels. *Id.*

The OCA recognized that the Company only planned to provide the reports for the course of one year and applauded the same. *Id.* at 19. However, the OCA recommended that, if the Company were not discontinuing HER in Phase V, then it should track whether Home Energy Report (HER) recipients are participating in other residential programs and use that information to tailor the content of the HERs, ensuring that the reports provide relevant and complementary guidance to maximize energy savings. *Id.*

In rebuttal testimony, Company Witness Miller testified that the limitations or requirements proposed by the parties, including OCA as to the proposed HER program, are inconsistent with the Commission's established goal-setting process. FE PA St. 1-R at 6. Mr. Miller emphasizes that the targets and acquisition costs were based on the comprehensive MPS. *Id.* The Company further claimed that because the Statewide Evaluator did not consider these new thresholds or limitations as proposed by the parties inclusive of the OCA, adopting them now would bypass the established process, potentially jeopardizing its ability to meet mandated targets and exposing it to penalties. *Id.* at 6-7.

The Joint Petitioners agreed to the following:

The Company agrees to assess cross-participation by Home Energy Report ("HER") recipients in other residential energy efficiency programs through evaluation of the program and will leverage this information to encourage participation in other residential programs.

(Settlement at ¶ 28).

The OCA respectfully asserts that this settlement provision is in the public interest because it ensures that HER recipients are evaluated for participation in other residential energy efficiency

programs and are encouraged to enroll in complementary measures. By leveraging this information, the Company can guide customers toward programs that deliver longer-lived and more substantial savings, improving the cost-effectiveness and overall impact of the portfolio. This approach addresses prior concerns that HER measures alone produce modest, short-term savings and do not persist when occupancy changes, while maximizing the value of program resources for all ratepayers. In this way, the provision promotes coordinated program participation, strengthens savings persistence, and resolves stakeholder concerns regarding the limitations of behavioral programs. The OCA respectfully asserts that this provision was essential to reaching Settlement herein, and that this term is also within the range of reasonable outcomes the parties could have achieved through litigation. Accordingly, the OCA recommends that the Commission approve the same.

C. Residential Barriers (Settlement at ¶¶ 25, 26, 48).

The Company's Phase V Plan had recognized that there are significant barriers in the residential program with regard to upfront costs and health and safety issues. Specifically, the Company alleged that the Plan as filed would address initial cost of energy efficient products and home retrofits, look for opportunities to develop and promote a midstream component for specific products, increasing trade allies, and bolster customer education in various ways. Phase V Plan at 46-47.

However, according to OCA Witness Stacey Sherwood, the Phase V Plan as submitted to the Commission does not appear to be designed to address these barriers. OCA St. No. 1 at 23. In Section 4.4.4 of the First Energy Phase V Plan, FE acknowledged concerns with health and safety arising while working in customers' homes. *Id.* at 26-27, *See also* Phase V Plan at 135. Ms. Sherwood recommended an approach of offering an interest rate buy-down, where incentive

funds reduce a customer's loan rate, making investments like heat pumps or insulation more affordable over time, and in a manner that could potentially serve as a pilot program. *Id.* at 23-24. Recognizing limited Act 129 funds and customer preference for rebates, the OCA also urged the Company to pursue alternative financing strategies, including partnerships with community banks and development financial institutions, promotion of state energy efficiency loan programs, and encouraging vendors to provide 0% financing options. *Id.* Ms. Sherwood explained in her testimony that these efforts should extend to both residential and small commercial customers, with dedicated funds allocated to develop and implement financing pathways that complement existing program offerings. *Id.*

Ms. Sherwood also recommended that FE should develop a moderate-income component that has increased rebate options for measures offered under its RESP component. This will expand demand for the program and can provide access to customers that may have previously been unable to participate, or barriered, due to upfront costs. *Id.* at 26. In explaining this concern, Ms. Sherwood stated that these recommendations come from her observation that, in Section 4.4.4 of the Company's Plan, the Company acknowledged that health and safety issues can arise when work is performed in customer homes and that these issues may prevent energy efficiency projects from moving forward. *Id.* Thus, the OCA also recommended establishing a larger dedicated health and safety budget to ensure that projects are not deferred due to health and safety concerns. OCA St. No. 1 at 27.

Pursuant to the Joint Settlement Agreement, the Company has agreed to:

25. ...pursue Health and Safety remediation with other available programs. If other programs are not timely available or applicable, the Company will provide a portion of its Low-Income Weatherization program component budget for Health and Safety remediation, up to 50% of the total weatherization measure cost, when the cost and energy savings attributable to the remediation meets program component acquisition cost based on available program funds. The Company will develop a

description of protocols and processes for addressing health and safety issues, including clear criteria for making referrals to LIURP or outside agencies vs. addressing the health and safety issues within the Act 129 programs, and a process flow chart that illustrates the customer journey from audit through health and safety remediation through installation of energy efficiency measures. The Company will also devise and implement a process for tracking and following up on health and safety referrals to reduce the number of deferrals. The Company will share the protocols and processes developed under this paragraph with the parties within 150 days of approval of the proposed Phase V EE&C Plan.

26. The Company agrees to target spending of at least \$600,000 per year of its Act 129 Low-Income Energy Efficiency Program budget on Health and Safety remediation to remove impediments for the installation of air sealing, insulation, and heat pumps for low-income households, subject to available program funding.

48. The Company will track and report Health and Safety remediation in its annual reports consistent with the Commission's reporting templates established for Phase V.

(Settlement at ¶¶ 25, 26, 48).

The OCA respectfully asserts that these provisions benefit all consumers, not just low-income households, by helping the utility maximize the overall effectiveness and efficiency of its energy efficiency programs. By dedicating funding to remove health and safety barriers, more households, including low-income participants, can successfully complete energy efficiency upgrades, which increases total energy and peak demand savings across the system. Higher participation and more reliable savings help the utility achieve program goals within the approved budget, which helps limit costs for all ratepayers.

Additionally, the requirement to track and report remediation activities enhances transparency and accountability, ensuring that program funds are used efficiently and that regulators can verify that programs are delivering measurable benefits. In effect, this strengthens program performance and helps control energy costs for all customers.

The Company's commitment to addressing health and safety concerns through budgeting and developing processes to address these issues head on is in the public interest. Through these

measures more members of the community will be able to enjoy the benefits of increased energy efficiency by reducing the number of deferred projects. In addition, tracking and reporting health and safety remediation in its annual reports provides crucial information on the program for the Company as well as stakeholders. Accordingly, the OCA recommends that the Commission approve the same.

D. Daily Load Shifting and Peak Demand Reduction (Settlement at ¶¶ 31, 33, 47)

The Company proposed a Daily Load Shifting (DLS) and Peak Demand Reduction (PDR) program for both residential and commercial customers in its filing. OCA St. No. 1 at 28. The Company explained its objective of the DLS and PDR program component was to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. Phase V Plan at 73. The Plan merely stated that the program contains a combination of event based and daily load shifting strategies including but not limited to connected device load shifting and custom demand response tailored to customer opportunities. *Id.*

OCA Witness Stacy Sherwood testified that the Company is proposing that both sectors will focus on targeting demand reduction during more than 400 eligible hours outlined by the Commission as peak periods. *Id.* These have been defined in the Commission's 2026 Technical Reference Manual as June, July, and August inclusive of non-holiday weekends from 2:00 pm to 6:00 pm and January and February inclusive of non-holiday weekends from 7:00 am to 9:00 am and 6:00 pm to 8:00 pm. 2026 TRM, Volume 1, page 10. Eligible measures include managed electric vehicle charging, storage, thermostat DLS, and thermostat demand response. OCA St. No. 1 at 28-29. Residential customers can participate in behavioral demand response programs, while commercial customers can participate in DLS and demand response efforts. *Id.*

However, and despite all of the above, the OCA observed that the Phase V Plan submitted to the Commission provided limited details as to how this would all work. *Id.* Ms. Sherwood's specific concerns about the program as filed included not having information as to how participants will be enrolled and which types of marketing will be used to support implementation. *Id.* In its Phase V Plan, FE noted that it would be unable to address the concerns held by Ms. Sherwood until after it had selected a CSP for these programs. OCA St. No. 1 at 29, *See also* Phase V Plan at 45. In light of the lack of information, OCA recommended that the Company remove the DLS and PDR components from its Plans until it has secured a CSP to provide additional information on the program parameters, rules, incentives, and reasonable projections for participation and savings. OCA St. 1 at 32.

In its rebuttal testimony, Company witness Miller testified that the Company had worked with experienced demand response providers and relied on the MPS in further support. FE PA St. 1-R at 9-10. In other words, the Company addressed concerns by effectively asking the Commission to place complete trust in the Company and the CSP to manage these issues on their own. *Id.*

Pursuant to the Joint Settlement agreement the Company agreed to:

31. ...revise its DLS and PDR program components projections for smart thermostats to 6MW to reflect a ramp up in participation and savings that also allows sufficient time for a CSP to be onboard.
33. ...clarify the incentive structure for the Daily Load Shifting and Peak Demand Reduction program components in Appendix B Table 8: Eligible Measures by technology and that the incentive structure will be based on industry experience. The Company agrees to work with its evaluation, measurement and verification CSP, implementation CSP and the Statewide Evaluator to develop interim measure protocols for DLS & PDR and to conduct seasonal reviews of relevant data in the Company's tracking system (e.g., participation, opt-out rates, summer and winter peak load reductions). The Company further agrees to review the performance of its DLS & PDR program performance in stakeholder meetings.

47. The Company agrees to track and report customer participation and demand savings of its Daily Load Shifting and Peak Demand Reduction program components in its Annual Reports consistent with the Commissions reporting templates established for Phase V.

(Settlement at ¶¶ 31, 33, 47).

The OCA respectfully asserts that these settlement provisions are in the public interest because they ensure that DLS and PDR programs are transparent, accountable, and effective. Revising the smart thermostat projections to 6 MW establishes realistic expectations for participation and savings while allowing sufficient time for program implementation, thereby maximizing system-wide benefits. Clarifying the incentive structure based on industry experience provides customers with fair and predictable incentives that encourage meaningful participation. Furthermore, the Company's commitment to work with evaluation, implementation, and Statewide Evaluator teams to develop interim protocols, conduct seasonal data reviews, and assess program performance in stakeholder meetings promotes continuous oversight and program improvement. By tracking and reporting customer participation and demand savings in annual reports consistent with Commission templates, the provisions ensure transparency and accountability, allowing regulators and stakeholders to verify that programs deliver measurable benefits. Collectively, these measures optimize energy and peak demand savings, enhance program effectiveness, and protect ratepayers by ensuring that utility resources are used efficiently and equitably.

E. Front of the Meter (Settlement at ¶¶ 40-42).

The Phase V Plan includes a Front of the Meter component in the RESP and C&I Solutions Programs both small and large. OCA St. No. 1 at 32. The Phase V Plan does not include a similar provision in LIEEP. *Id.* The Company stated it would coordinate its Front of the Meter (FTM) initiatives and operations to target energy savings and peak load reductions from corresponding

improvements. Phase V Plan at 102. The Company further stated that some improvements may include replacement of and upgrades to energy delivery equipment, voltage optimization, efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment and solar photovoltaic projects that are associated with an existing retail meter. *Id.* These measures had not been fully determined in the Phase V Plan as submitted to the Commission. The Company has not determined the exact amount of savings that these measures will provide over the five-year Phase V Plan period.

As the Phase V Plan is currently, there are no energy savings or demand reductions from this program. OCA Statement No. 1 at 32. The Company plans to allocate \$31,340 per year up to \$156,700 throughout Phase V to target potential measures to enhance efficiency of energy delivery and help to mitigate resource adequacy needs across customer classes. *Id.* The OCA recommended that this investment not be included in the Phase V Plan because the Company should focus on assessing system efficiencies that promote energy savings and demand reductions in its delivery system. *Id.* at 33. OCA Witness Stacy Sherwood suggested that FE could request a change to its Phase V Plan and provide forecasted energy savings, demand savings, participation, cost, and incentives should the opportunity present itself. *Id.*

The Joint Petitioners have agreed to the following with regard to the Front of the Meter component proposed by FE in its Phase V Plan.

40. The Company agrees to assign FTM savings and costs to the appropriate customer classes based on energy savings, except that no FTM savings or will be assigned or allocated to the low-income customer savings carve-out requirement, and no costs will be assigned to the low-income customer programs.

41. The Company agrees to review FTM measures that it identifies to include in its proposed Plan, including costs, projected energy and demand savings by sector and EM&V protocols, with interested parties ninety (90) days prior to their implementation during Phase V, and will consider and respond to any comments provided by the parties.

42. The parties' agreement in this settlement is not an indication that they agree to the prudence or cost effectiveness of the FTM proposal, as further clarified pursuant to paragraph 40, and reserve the right to challenge the FTM program in an appropriate filing or subsequent phases.

(Settlement at ¶¶ 40-42).

The proposed changes to the FE Front of the Meter Program are in the public interest. Assigning Front of the Meter savings and costs to the appropriate customer class provides the Company and interested parties with a clear picture of the savings projected from this program per customer class and in the aggregate. This change addresses some of OCA Witness Stacy Sherwood's concerns as the Company will provide additional details that are lacking in the Phase V Plan currently. Additionally, FE's willingness to involve interested parties in reviewing key components of the plan will benefit both the Company and the public as it will allow for a robust plan to be shaped meeting both Company and public goals. The OCA appreciates the Company's willingness to work with interested parties to potentially provide long-term benefits to all involved.

VI. ADDITIONAL SETTLEMENT TERMS AND CONDITIONS

The OCA does not oppose the remaining paragraphs of the Settlement reflecting an agreement by the Company, as the remaining paragraphs are reasonable compromises in consideration of possible litigation outcomes and are in the public interest.

VII. CONCLUSION

The OCA submits that the terms and conditions of the proposed Settlement of the FirstEnergy Pennsylvania Electric Company's proceeding represent a fair and reasonable resolution of the issues and claims arising in this matter. If approved, the proposed Settlement will benefit the Commission and all Parties by foregoing the additional costs of litigation and will provide consumers with a reasonable EE&C Plan. For the foregoing reasons, the Office of

Consumer Advocate submits that the proposed Settlement is in the public interest and in the interest of First Energy's customers and therefore, should be approved.

Respectively Submitted,

/s/ Katie Kennedy

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